WIOA STATE PLAN FOR
THE COMMONWEALTH OF PENNSYLVANIA

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the U.S. Secretary of Labor that outlines a four-year workforce development strategy for the State's workforce development system. The publicly-funded workforce system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all jobseekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

OPTIONS FOR SUBMITTING A STATE PLAN

A State has two options for submitting a State Plan — a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are—

- the Adult Program (Title I of WIOA),
- the Dislocated Worker Program (Title I),
- the Youth Program (Title I),
- the Adult Education and Literacy Program (Title II),
- the Wagner-Peyser Act Program (Wagner-Peyser Act, as amended by title III), and
- the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II and III of this document) where specified, as well as the program-specific requirements for that program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))*
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
    - State Strategy Implementation,
    - State Operating Systems and Policies,
    - Assurances, and
    - Program-Specific Requirements for the Core Programs, and
    - Program-Specific Requirements for the Combined State Plan partner programs.

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.* While discussion of and strategies for every target population is not expected, States must address as many as are applicable to their State's population and look beyond strategies for the general population.

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* Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

I. WIOA STATE PLAN TYPE

Unified or Combined State Plan. Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

Unified State Plan. This plan includes the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program. No

Combined State Plan. This plan includes the Adult Worker Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program as well as one or more of the optional combined State Plan partner programs identified below. Yes

COMBINED PLAN PARTNER PROGRAM(S)

Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) Yes

Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.) Yes

Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) Yes

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))) No

Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)) Yes

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.) Yes

Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law) No

Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)) Yes

Employment and training activities carried out by the Department of Housing and Urban Development No

Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) Yes

Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))] Yes

II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include-

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

Provide an analysis of the industries and occupations for which there is existing demand.

II. EMERGING INDUSTRY SECTORS AND OCCUPATION

Provide an analysis of the industries and occupations for which demand is emerging.

III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in 1 and 2 above, provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Non–farm jobs data indicate that Pennsylvania is currently in a jobs expansion period, following the job recovery period which began in early 2010. From December 2013 to December 2014, non–farm jobs increased by 70,900 (1.2 percent) in Pennsylvania. During the same timeframe, US non–farm jobs increased 3.1 million jobs (2.3 percent) to 140.6 million. Pennsylvania's job growth occurred among private sector industries over the year, as government jobs decreased by 7,800 (–1.1 percent) (source: Current Employment Statistics).

In December 2014, goods–producing jobs in Pennsylvania were up 17,400 from December 2013. All three goods producing super–sectors grew over the year with Construction experiencing the highest increase (4.9 percent). Mining & Logging posted a 3.9 percent increase over this period, while Manufacturing experienced modest growth at 0.9 percent.

Pennsylvania's economy continues to shift from goods–producing to service–providing. Accordingly, service–providing jobs in December 2014 were up 53,500 from one year prior. Over the same period, Pennsylvania's best performing service–providing industry sectors (measured by percent increase) were Transportation & Utilities (4.3 percent), Educational Services (2.7 percent), Professional, Scientific & Technical Services (2.7 percent) and Accommodation & Food Services (1.8 percent). Identifying and meeting the workforce needs of expanding industries is paramount to the continued success of the state's economy.

Future of PA's Labor Market

From 2012–2022, Pennsylvania's total employment is expected to increase by 468,000 (7.7 percent) to a level in excess of 6.5 million. This growth rate is higher than previous growth rates for the state but still less than the 2012–2022 growth rate projected for the nation (10.8 percent). The demographics of Pennsylvania are a key factor in limiting employment growth.

Employment activity in all sectors highlights the dynamics of an aging population's need for more health care, transition of baby–boomers from worker to retiree, constant technological changes, and continued transformation of the state's economy from that of a goods–producer to a service–provider. Growth will be greatest in the Construction, Professional & Business Services, and Education & Health Services sectors.

With an increase of more than 189,000, Education & Health Services is projected to add the most employment by 2022. Professional & Business Services is also projected to increase employment by nearly 116,000. It is also important, however, to look at growth rates in addition to volume growth. The Construction sector is projected to have very robust growth rates in the state (19.1 percent) and is expected to finally surpass pre–recession employment levels. Conversely, driven largely by the contraction of the postal service, Government is expected to decrease employment by more than 7,600 (2.0 percent). Together, Manufacturing and Information are projected to see a similarly sized employment decrease. However, it is important to note that the 2012–2022 projections were begun shortly after the end of the recession and reflect economic assumptions that may no longer be valid. For example, manufacturing employment in Pennsylvania has risen slowly since 2010 after experiencing a large decline during the previous decade.

The need for workers in specific occupations can exist regardless of whether or not the industry sector is growing or declining due to replacement needs. Modest economic growth coupled with an aging workforce will create opportunities for job seekers in all major occupational groups.

Seven of the 13 occupational groups are projected to have growth rates above the statewide overall growth rate of 7.7 percent. Healthcare Practitioners, Technicians & Support Workers will increase employment the fastest at a rate of 17.3 percent (nearly 100,000 employees). The Construction & Extraction group will add less employment, about 37,000, but at the second–fastest rate (14.3 percent). Only one occupational group – Farming, Fishing & Forestry – is projected to experience an employment decline through 2022 with a total employment loss of only 750 (–1.5 percent)

Employment growth is only one component in determining the annual need, or openings, for workers in a given occupation. Each year, Pennsylvania is expected to have more than 193,000 annual openings across all occupational groups. In reality, only 26 percent of all annual openings are due to growth. Annual need, or openings, also includes an estimate to replace workers who leave the occupation and/or retire. Some occupational groups with low growth rates, like Office & Administrative Support, have a very large amount of annual openings (26,150). The need for workers in occupational groups with minimal growth or even a decline, such as Production (9,900 openings), can still outpace the overall need for workers in groups with strong growth, such as Computer, Engineering & Science (9,563 openings) or Construction (8,224 openings).

It is important to consider the information from all angles to fully understand Pennsylvania's emerging workforce needs. Occupations with the largest employment growth by volume are often traditional occupations with a large employment base and a consistent need for workers, while occupations with the fastest employment growth rates, are often emerging occupations. Looking at

occupations with the most annual openings provides yet another set of occupations to focus on. These are primarily entry–level jobs that have a sizable need to replace workers regularly and often do not pay family–sustaining wages.

It is also important to remember that occupations with a large number of annual openings are not always attractive targets for workforce development. If high turnover rates are the main reason for a large number of openings in an occupation, then the more appropriate policy response may be to find ways to reduce turnover rather than to train more workers to fill the available openings.

The top 10 occupations by volume growth include Registered Nurses, Home Health Aides, Personal Care Aides, Combined Food Prep/Serving Workers, Heavy & Tractor–Trailer Truck Drivers, Laborers & Material Movers, Secretaries, Carpenters, Customer Service Representatives, and Nursing Assistants.

The top 10 occupations by percent growth include Physical Therapist Aides, Diagnostic Medical Sonographers, Home Health Aides, Information Security Analysts, Personal Care Aides, Meeting, Convention & Event Planners, Market Research Analysts, Physical Therapist Assistants, Cardiovascular Technicians, and Occupational Therapy Assistants.

The top 10 occupations by the number of annual openings include Retail Salespersons, Cashiers, Combined Food Prep/Serving Workers, Registered Nurses, Waiters & Waitresses, Laborers & material Movers, Customer Service Representatives, General Office Clerks, Home Health Aides, and Janitors & Cleaners.

Through 2022, industry credentials, postsecondary education and college degrees will become more important. Pennsylvania, with over 400 postsecondary educational institutions, is well positioned to effectively meet the needs of the future workforce. Educational requirements of occupations will shift away from short–term and moderate–term on–the–job training lasting no more than one year towards long–term training and some amount of formal education. All educational categories are projected to experience growth, as shown in the chart that follows.

Occupations requiring an Associate degree have the highest growth rate (15.8 percent) but employ the smallest number of people (about 253,000). Conversely, most employment is found in the on–the–job training category (3.3 million) but that category will have the slowest growth rate (6.2 percent). This shift from on–the–job training to some postsecondary education or an Associate degree is strongly connected with growth in Healthcare, Transportation, and Construction jobs. Occupations requiring long–term training, some postsecondary education or past experience, a Bachelor’s degree, or an advanced degree all hover around a modest 10.0 percent growth, while employment ranges from approximately 340,000 to 970,000.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy,

and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. ** Veterans, unemployed workers, and youth, and others that the State may identify.

I. EMPLOYMENT AND UNEMPLOYMENT

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

II. LABOR MARKET TRENDS

Provide an analysis of key labor market trends, including across existing industries and occupations.

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Provide an analysis of the educational and skill levels of the workforce.

IV. SKILL GAPS

Describe apparent ‘skill gaps’.

Pennsylvania’s future depends upon the development of a workforce able to compete in today’s global economy. To remain economically competitive, an understanding of the current labor market and future workforce needs of employers is necessary when developing policies and strategies for Pennsylvania.

The commonwealth has a diversified economy as demonstrated by its industry clusters, which are further examined in the Sector Strategies section. Pennsylvania also presents an increasingly–skilled workforce in alignment with changing employer expectations. The commonwealth’s capacity to provide an educated workforce is evidenced by over 400 postsecondary educational institutions which collectively enrolled nearly one million students in 2012–13. An eclectic mix of urban, suburban and rural areas draws people with wide–ranging interests to the state for many reasons. Proximity to nearly one–half of the nation’s population and strongest job markets makes Pennsylvania an ideal location for businesses and families. While these characteristics of the commonwealth’s labor market contribute to its economic strength, they add workforce complexities due to varied employer demands and evolving skill expectations.

The availability and analysis of labor market information and trends is essential to the creation of effective workforce and economic development strategies and policies. By utilizing information about the population, labor force, industry mix and employment outlook, the state can enhance its existing sector strategies and ensure they align with the current and expected labor market demands.

According to IHS Global Insight’s 2014–2024 Population Projections, over the next 10 years, Pennsylvania’s population is projected to grow by only 1.7 percent. In comparison, the nation’s population growth over the same time period is projected to be 8.2 percent. While the state’s overall population growth will be relatively low in the years to come, the change in age distribution will be more dramatic.

Simply stated, Pennsylvania's population is growing older. The number of Pennsylvanians age 65 and over was 2.1 million in 2014. The state's percentage of those aged 65 and over is the sixth highest in the nation (16.7 percent) – only Florida (19.1 percent), Maine (18.3 percent), West Virginia (17.8 percent), Vermont (17.0 percent) and Montana (16.7 percent) are higher. This is largely a by–product of the aging of the population born during the Baby Boom period after World War II (1946 to 1964). The growth of this population will likely lead to an increased need for workforce services, including by members who also fall into priority categories.

Pennsylvania also has a growing immigrant population. According to American Community Survey 2010–2014 five–year estimates and Census 2000, Pennsylvania's immigrant population has grown by 53.9 percent since 2000 and now numbers 782,103 people, including 439,786 workers.

While the overall population will increase modestly, the labor force will shrink barring a substantial in–migration of workers. Workers from the front–end of the baby–boom generation are moving into their 60s and, beginning in 2011, were expected to retire from the workforce in large numbers. Due to the recent economic conditions, many chose to remain employed, thus complicating job opportunities for younger workers. Inevitably, baby–boomers will leave the workforce in large numbers very soon, taking with them knowledge and experience that kept industry growing and prosperous.

Education must play a vital role in preparing the workforce for the future demands of the economy. According to the American Community Survey, during the 2009–2013 period, Pennsylvania ranked 44th among states in the share of adults (age 25 and up) with more than a high school diploma. Pennsylvania's low ranking for postsecondary education share reflects its second–place ranking for working–age adults with exactly a high–school degree and its 49th–place ranking for the share of such adults with "some college." These rankings reflect historical and cultural factors including the fact that a high–school education enabled men to obtain family–sustaining jobs for more than a generation after World War II. They also reflect the state's lack of a community college infrastructure in rural parts of the state.

Currently, 52.3 percent of Pennsylvanians have participated in some level of postsecondary education. Another 38.5 percent are high school graduates with no postsecondary experience and about nine percent have less than a high school diploma. Strategies focused on these individuals are paramount to meeting the future demands of employers and achieving Governor Wolf's goal of 60 percent of Pennsylvanians holding a college or industry–recognized credential by 2025.

Workforce strategies must also take into account the skills and abilities of individuals with barriers to employment, including individuals with disabilities, veterans, ex–offenders, Temporary Assistance for Needy Families (TANF) recipients and those who do not speak English well or at all, to meet present workforce needs and future demand. In 2014, there were about 1.4 million working age individuals with disabilities living in Pennsylvania. They account for 13.4 percent of the state's working age population compared to 11.8 percent nationally. Pennsylvania's veterans numbered more than 880,000 in 2014 or 8.9 percent of the working age population. Approximately 1 out of every 66 Pennsylvanians has been incarcerated in a state prison, a figure that does not include those who have served time in county jails or juvenile offenders. In 2014, there were 43,600 TANF recipients. In 2013 there were approximately 171,200 individuals who did not speak English well or at all.

While the commonwealth will focus workforce development activity on growing the pipeline of new talent, efforts will also be made to support older workers who wish to remain in the labor force. According to Current Population Survey (CPS) figures from 2013, 31.8 percent of Pennsylvanians

ages 65 to 69 are currently in the workforce (employed or looking for work). A 2015 study from Bank of America/Merrill Lynch found that 47 percent of current retirees say they either have worked or plan to work during their retirement. More striking, 72 percent of those 50 or older who have not yet retired say they want to keep working after they retire. The study finds this phenomenon to be driven by four forces: increasing life expectancy; elimination of pensions for most workers; recent economic uncertainty; and a re–visioning of later life, as new generations seek greater purpose, stimulation, social engagement and fulfillment in retirement. Employers often desire to hire older workers, who are generally viewed as reliable, loyal and ethical with well–established critical thinking, leadership, teamwork and communication skills.

Current State of the PA Labor Market

The National Bureau of Economic Research (NBER) declared that a national economic recession began in December 2007 and ended in June 2009. As labor markets tend to lag behind output markets, Pennsylvania's peak monthly unemployment rate since the recession began (8.7 percent) occurred in February and March of 2010. The unemployment rate in Pennsylvania during this period also peaked at an annual average of 8.5 percent in 2010, which was its highest level since 1984. Also in 2010, the average number of unemployed residents peaked at 540,000 and average employment dropped to 5,841,000, its lowest level since 2003.

Pennsylvania's labor market has shown signs of recovery over the past few years. The state's average employment increased by 45,000 from 2013 to 2014, and increased by168,000 from 2010 to 2014. Despite these increases, employment levels are still below the average 2007 pre–recession level of 6,064,000. The average unemployment rate in 2014 was 5.8 percent, or 1.6 percentage points lower than in 2013. Effective workforce and economic development strategies are needed to ensure continued progress and the attainment of sustainable employment for Pennsylvania's unemployed.

Overall in 2014, there were 6,378,000 total individuals in Pennsylvania's labor force, of which 6,009,000 were employed and 370,000 unemployed. This equated to an unemployment rate of 5.8 percent and a labor force participation rate of 62.4 percent. The corresponding rates for the US were 6.2 percent and 62.9 percent, respectively.

In 2014, there were 272,300 persons with disabilities in Pennsylvania's labor force, of which 228,600 were employed and 43,700 were unemployed. This equated to an unemployment rate among this population of 16.0 percent and a labor force participation rate of 19.9 percent. The corresponding rates for the US were 12.5 percent and 19.5 percent, respectively.

Additionally in 2014, there were 409,800 veterans in Pennsylvania's labor force, of which 390,400 were employed and 19,500 were unemployed. This equated to an unemployment rate among the veteran population of 4.7 percent with a labor force participation rate of 46.5 percent. The corresponding rates for veterans in the US were 5.3 percent and 50.6 percent, respectively (source: Current Population Survey).

Among the unemployed, the hardest to serve are the long–term unemployed (those unemployed 27 weeks or more). From 2007 to 2010, the number of long–term unemployed in Pennsylvania and in the U.S. increased more than 500 percent. In Pennsylvania, both the number and percent of the long–term unemployed remained elevated through 2013, but decreased by 77,800 (40.1 percent) during 2014, to 116,400. The share of those unemployed long–term dropped to 31.9 percent of the total unemployed population. By comparison, the U.S. long–term unemployment level decreased

25.3 percent to 3,218,000 from 2013 to 2014 and constituted 33.4 percent of the nation's unemployed population.

Another indicator of an economy's strength is the employment/population ratio (EPR). In 2014, the average employment/population ratio in Pennsylvania was 58.8 percent as compared to 61.7 percent in 2007. Overall, the nation experienced a similar drop in this ratio over this period, falling from 63.0 percent in 2007 to 59.0 percent in 2014. The decrease occurred for both males and females in Pennsylvania over this time period, with EPR decreasing from 67.9 percent to 63.9 percent for males, and decreasing from 56.0 percent to 54.2 percent for females. EPR decreased among major demographic groups in Pennsylvania, including whites (–2.3 percentage points), African–Americans (–4.2 percentage points), and Hispanics (–3.8 percentage points). Decreases were seen for both males and females among these demographic groups.

EPR decreases were also seen across educational attainment levels, including High School graduates (–5.3 percentage points), those with some college or Associate degrees (–3.9 percentage points), and those with bachelor's degrees (–4.7 percentage points). EPR for those without a High School Diploma actually increased slightly (+0.6 percentage points) over this time period, but remained substantially below the overall Pennsylvania rate, with an EPR of only 33.3 percent in 2014 (source: Current Population Survey).

The data presented above indicate the EPR is affected by demographic and secular trends as well as the economic environment. African–American males and individuals with only a high school diploma posted the largest percentage point decline over this period.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in *Education and Skill Levels of the Workforce* above, and the employment needs of employers, as identified in *Employers' Employment Needs* above. This must include an analysis of –

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop delivery system partners.*

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* Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

The Pennsylvania Combined State Plan includes the six core programs and the following optional programs: Career and Technical Education Programs Authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins); the Temporary Assistance for Needy Families (TANF) Program; the Trade Adjustment Assistance (TAA) Program; programs under the Jobs for Veterans State Grant (JVSG); the Senior Community Service Employment Program (SCSEP); the Community Services Block Grant (CSBG); and the Reintegration of Ex-Offenders (REO) Program. Collectively, the thirteen programs included in the Combined State Plan work to serve target populations, including individuals with barriers to employment and incumbent workers, in finding and maintaining employment while concurrently meeting the talent needs of employers, as follows:

WIOA Title I Adult: The Adult program serves participants age 18 or older in need of employment or career advancement, with priority of service given to participants deemed to be recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient; if the participant is also found to be an eligible Veteran or spouse of a Veteran (Covered Person) the priority of service will be extended to the covered person. Individuals deemed ready for work are provided career services to assist them in finding existing employment opportunities. Individuals not ready for employment or looking for employment in a new field are provided training to prepare them with the skills necessary to meet the needs of employers.

WIOA Title I Dislocated Worker: The Dislocated Worker program assists workers before or after layoff to help facilitate rapid reemployment. Dislocated workers with requisite skills may be directly referred to employers with hiring needs. Other dislocated workers may require training and other services in order to meet the skill requirements of employers.

WIOA Title I Youth: The Youth program is designed to serve eligible youth and young adults through high-quality case management support toward educational attainment that includes career guidance and exploration, the provision of summer and/or year-round work experience opportunities such as internships and pre-apprenticeships, and skills training along a career pathway for in-demand industries and occupations, along with any necessary supportive services. The attainment of education, skills and work experience makes Youth participants more attractive candidates for employers looking to hire.

WIOA Title II Adult Basic Education: Adult basic education is a critical partner in establishing career pathways for adults who are deficient in basic skills. Funded programs provide a full range of adult basic education services from beginning level literacy through high adult secondary and transition activities to support college and career readiness; these services include English language acquisition activities where needed. Programs provide basic skills instruction in the context of work readiness and incorporate workplace preparation activities and career awareness and planning in instruction and services. Adult basic education program administrators and other staff develop relationships and partnerships at the local level to support alignment of adult basic education services with the services of the other programs and workforce development system partners to include working with local Business Service Teams (BSTs). Funded programs will provide integrated education and training whenever possible and appropriate. Integrated education and training requires three components offered concurrently and contextualized to an occupation or occupational cluster: adult basic education, workforce preparation, and workforce training. Integrated education and training activities will be aligned with local workforce needs, prepare students for realistic, existing employment opportunities, and be developed in consultation with LWDBs, employers, and training providers.

WIOA Title III Wagner-Peyser: Wagner-Peyser staff provides employment services to both job seekers and employers with the ultimate goal of placing individuals in employment and filling employer job orders.

WIOA Title IV Vocational Rehabilitation: The Office of Vocational Rehabilitation (OVR) provides vocational rehabilitation services to help persons with disabilities prepare for, obtain, or maintain employment. The OVR Single Point of Contact (SPOC) model is designed to help any employer hire and on-board talented individuals with disabilities. The model connects the employer to one individual responsible for coordinating all program supports to include pre-screened talent recruitment and on-boarding supports to ensure new hire success.

Perkins: Perkins funds support career and technical education programs at the secondary and postsecondary levels. Perkins programs work with businesses to identify relevant technical standards to include national industry standards and credentialing opportunities where appropriate, to ensure that program completers have the skills needed by employers.

TANF: To increase work participation rates and to promote self-sufficiency, Pennsylvania has adopted a work-first approach to help TANF clients succeed in their pursuit of self-sufficiency. Pennsylvania requires each adult, minor head of household or minor child age 16 or 17 who is not in school to engage in work or an approved employment and training activity. Individuals who have some work experience are referred to the EARN program, which assists with job placement and job training opportunities. At this stage of services, it is anticipated that individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On-The-Job training program or a Transitional Job Program. Individuals who need to rectify some barriers such as literacy, “soft skills” development and support services such as child care and transportation assistance are referred to a Work Ready provider. This contracted provider assists the individual with barrier removal strategies and then refers him or her to the EARN program when he or she is ready. Individuals who could benefit from a training opportunity at a community college are referred to the KEYS program. This program enrolls individuals who are ready to learn in a college setting. Once the individual has completed their education at the community college, he or she will be connected to the PA CareerLink® system for job placement assistance. All activities are aimed at increasing the skills and employability of TANF recipients so that employers are able to hire them.

TAA: TAA eligible workers are provided services and benefits to assist them in returning to the workforce in the shortest period of time. Services and training provided ensure that TAA recipients have the skills needed to find reemployment within the industry they were laid off from or to enter a new industry where employment opportunities exist.

JVSG: Through the JVSG program, Disabled Veterans Outreach Program (DVOP) Specialists assist veterans with significant barriers to employment such as long-term unemployment, previous incarceration, and low-income status. Another element of the program is carried out by Local Veterans Employment Representatives (LVERs) who meet with employers, plan and participate in job and career fairs and conduct job development with employers on behalf of veterans. LVERs work with the PA CareerLink® BSTs in promoting qualified veterans to employers seeking candidates.

SCSEP: SCSEP promotes part-time employment opportunities in community serve activities for unemployed low-income persons who are age 55 or older and who have poor employment prospects. SCSEP utilizes labor market information to identify occupations most likely to hire older workers and prepares participants for those jobs. Some SCSEP grantees already work with PA CareerLink® BSTs to develop employment opportunities for older workers; additional partnerships

with BSTs will be pursued. Employers often desire to hire older workers, who are generally viewed as reliable, loyal and ethical with well-established critical thinking, leadership, teamwork and communication skills.

CSBG: CSBG funded programs provide opportunities for participants to attain basic soft skills, occupation-specific skills and work experience necessary to meet employer talent needs.

REO: Increased collaboration and alignment of reentry planning and service activities among system partners can improve the justice-involved individual's ability to attain and retain a job that pays family-sustaining wages. Efforts described in the Combined State Plan will allow for greater coordination of services and activities provided by REO grantees with the workforce development system. Activities seek to not only get the justice-involved individual employed, but to provide the necessary supports to allow employment retention, thus reducing turnover and costs for employers providing job opportunities to justice-involved individuals.

Service delivery is coordinated and integrated among core and partner programs in a number of ways. One method of integration is the proliferation of PA CareerLink® centers, Pennsylvania's one-stops, across the commonwealth. PA CareerLink® offices are the physical locations where, at a minimum, the services associated with each WIOA-mandated partner's core programs are provided. In addition, many partner program services, such as post-secondary recipients required under Pennsylvania's Perkins plan and TANF programs, can also be accessed through the PA CareerLink® offices. Integration of PA CareerLink® service delivery is critical for effective and efficient service to customers. All partners have itemized the types and availability of services to be provided in the PA CareerLink® Partner Agreement.

Within the PA CareerLink®, program staff is aligned functionally, rather than by program. Aligned functions include: welcome function to include the greeting and initial intake and assessment of customers; skill and career development function to include the provision of career and training services; and business services function to include building relationships with employers through regional initiatives, including but not limited to sector partnerships, business alliances and identifying opportunities to address the human resource needs of employers. This alignment offers direct access to a broader range of services that can be adapted and leveraged to address each customer's unique needs.

Coordinated service delivery will also be achieved through the development of career pathways as described in Goal 1. Career pathway development will be led by Local Workforce Development Boards, in partnership with employers, multi-employer workforce partnerships, secondary and postsecondary education providers, Title I, adult basic education and vocational rehabilitation program providers and other combined plan partner programs capable of providing supportive services, such as TANF. Goal 1.4 stresses cross-program funding and programmatic integration of workforce preparation activities to develop soft-skills, adult basic education and occupational training, supplemented by supportive services, as part of career pathways models to facilitate access for individuals with barriers to employment. Goal 1.5 emphasizes co-enrollment of individuals in core and other partner programs as another means of achieving the best outcomes for those with barriers.

It is also imperative that the workforce system is responsive to the employment needs of employers. Goal 4 focuses on engaging employers as critical partners in the education and workforce system, not just end-users. One established method of identifying and responding to the needs of employers is through the Industry Partnership program. Industry Partnerships were funded initially to deliver

incumbent worker training because that was where employers saw the biggest gaps. Moving forward, Industry Partnerships will also be used to address other common workforce challenges faced by employers to include finding qualified entry-level workers, recruitment of low-income individuals and workers from other targeted groups, including veterans and individuals with disabilities, and the re-employment of dislocated workers within an industry sector. Pennsylvania will also place additional emphasis on establishing new and expanding existing Registered Apprenticeship programs as a means of addressing employer talent needs. The recently established Pennsylvania Apprenticeship and Training Office will work closely with Combined State Plan core and partner programs to promote and support pre-apprenticeship and Registered Apprenticeship programs as part of relevant career pathway models.

Business Service Teams (BSTs) in the PA CareerLink® centers work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring candidates for on-the-job or customized training where the referred individual is not immediately ready to take on the full duties of the position. BSTs also have access to a plethora of labor market information that can be helpful to employers in setting wages and benefits that will attract high-quality candidates. BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post-secondary providers who can serve as a source of talent for employers.

Further detail regarding the alignment of programs, to include program alignment and how services are coordinated for both individuals and employers, can be found in the Operational Planning Elements section of the Combined State Plan.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A) above.

Implementation of WIOA provided the commonwealth a new opportunity to fully evaluate the workforce development system and establish new policies, procedures and strategies to better meet the skill needs of the workforce and the talent needs of employers. The evaluation also allowed for the identification of strengths and weaknesses at a state level.

Identified areas of strength include:

• Strong relationships among agency executive leadership allowing for collaboration on numerous initiatives and grant applications and frequent sharing of information and best practices.

• Diverse secondary and postsecondary education and training opportunities in the state.

• A decade of experience working with sector strategies through programs like the Industry Partnership program, which has trained over 100,000 employees since its inception and has been modeled by numerous other states.

• A history of successfully applying for and administering competitive federal grants.

• Ample data through the Center for Workforce Information and Analysis (CWIA) and other sources to inform decisions and strategies.

Identified areas for improvement include:

• Increasing the share of working–age adults who have postsecondary education or industry–recognized credentials.

• Increasing the quantity and quality of online, self–service PA CareerLink® options, along with direct customer access to live–person assistance via phone, Internet coaches and access points in recognition of an increasingly tech–savvy society and limited funding which makes it difficult to maintain the existing physical one–stop presence.

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

• Integration and alignment of educational services, especially adult basic education services, with the workforce development system, including through co–enrollment of participants in Titles I and II. Development and utilization of contextualized literacy programs are crucial to helping TANF/SNAP Able Bodied Adults without Dependents (ABAWD) clients and will be a component of alignment of educational services.

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

The state will make significant investments in technology to improve service delivery and allow for collection of information necessary to support WIOA implementation. Multiple focus groups are in place to drive technology investment decisions.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A) above.

Pennsylvania's recent performance demonstrates our capacity to provide the workforce development activities described in the plan. Pennsylvania has met or exceeded its negotiated goals for WIA common measure performance for the past three years, qualifying for incentive grants in PY 2012 and PY 2013. Title II has exceeded its negotiated performance targets annually since 2011–2012. Pennsylvania is in the top two quartiles of performance in the majority of Title II outcome measures.

OVR performance standards are established by the Rehabilitation Services Administration. OVR had six main performance indicators, three of which – competitive employment outcomes, significance of disability and earnings ratio – were considered primary indicators. State VR agencies must meet or exceed at least four of the six performance indicators including at least two of the three primary

indicators. Pennsylvania OVR has exceeded the performance standards for all three primary indicators and has met or exceeded performance requirements for at least four total indicators in each of the last three years. Pennsylvania OVR has also exceeded the performance ratio level for serving minorities in each of the last three program years.

US DOL assesses the Pennsylvania Department of Aging and nine national sponsors providing SCSEP services in the commonwealth each year against six core SCSEP performance measures. These six measures are: entered employment, retention, average earnings, community service, service level and most in need. The US DOL establishes goals for each performance measure that its grantees, such as the Department of Aging, must meet or exceed. In both FY 13–14 and FY 14–15, the Department of Aging met or exceeded each performance measure.

Trade Act programs are focused on getting participants reemployed and ensuring those individuals maintain employment. In FY 2013 a total of 3,414 participants received Trade services of which 81.3 percent entered employment and 89.3 percent of those who entered employment retained employment. In FY 2014 a total of 2,887 participants received Trade services of which 100 percent entered employment and 98.2 percent of those who entered employment retained employment. The commonwealth will continue to emphasize and reinforce case management services as a means to maintain performance levels for Trade Act participants. Re–employment services will also be enhanced as a component of case management services for participants who have completed Trade Act training prior to exiting the program. This will ensure that participants are receiving the necessary assistance to enter the workforce with suitable employment in place.

The Pennsylvania Combined State Plan includes the six core programs and the following optional programs: Career and Technical Education Programs Authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins); the Temporary Assistance for Needy Families (TANF) Program; the Trade Adjustment Assistance (TAA) Program; programs under the Jobs for Veterans State Grant (JVSG); the Senior Community Service Employment Program (SCSEP); the Community Services Block Grant (CSBG); and the Reintegration of Ex-Offenders (REO) Program. Collectively, the thirteen programs included in the Combined State Plan work to serve target populations, including individuals with barriers to employment and incumbent workers, in finding and maintaining employment while concurrently meeting the talent needs of employers, as follows:

WIOA Title I Adult: The Adult program serves participants age 18 or older in need of employment or career advancement, with priority of service given to participants deemed to be recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient; if the participant is also found to be an eligible Veteran or spouse of a Veteran (Covered Person) the priority of service will be extended to the covered person. Individuals deemed ready for work are provided career services to assist them in finding existing employment opportunities. Individuals not ready for employment or looking for employment in a new field are provided training to prepare them with the skills necessary to meet the needs of employers.

WIOA Title I Dislocated Worker: The Dislocated Worker program assists workers before or after layoff to help facilitate rapid reemployment. Dislocated workers with requisite skills may be directly referred to employers with hiring needs. Other dislocated workers may require training and other services in order to meet the skill requirements of employers.

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WIOA Title II Adult Basic Education: Adult basic education is a critical partner in establishing career pathways for adults who are deficient in basic skills. Funded programs provide a full range of adult basic education services from beginning level literacy through high adult secondary and transition activities to support college and career readiness; these services include English language acquisition activities where needed. Programs provide basic skills instruction in the context of work readiness and incorporate workplace preparation activities and career awareness and planning in instruction and services. Adult basic education program administrators and other staff develop relationships and partnerships at the local level to support alignment of adult basic education services with the services of the other programs and workforce development system partners to include working with local Business Service Teams (BSTs). Funded programs will provide integrated education and training whenever possible and appropriate. Integrated education and training requires three components offered concurrently and contextualized to an occupation or occupational cluster: adult basic education, workforce preparation, and workforce training. Integrated education and training activities will be aligned with local workforce needs, prepare students for realistic, existing employment opportunities, and be developed in consultation with LWDBs, employers, and training providers.

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TANF: To increase work participation rates and to promote self-sufficiency, Pennsylvania has adopted a work-first approach to help TANF clients succeed in their pursuit of self-sufficiency. Pennsylvania requires each adult, minor head of household or minor child age 16 or 17 who is not in school to engage in work or an approved employment and training activity. Individuals who have some work experience are referred to the EARN program, which assists with job placement and job training opportunities. At this stage of services, it is anticipated that individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On-The-Job training program or a Transitional Job Program. Individuals who need to rectify some barriers such as literacy, “soft skills” development and support services such as child care and transportation assistance are referred to a Work Ready provider. This contracted provider assists the individual with barrier removal strategies and then refers him or her to the EARN program when he or she is ready. Individuals who could benefit from a training opportunity at a community college are referred

to the KEYS program. This program enrolls individuals who are ready to learn in a college setting. Once the individual has completed their education at the community college, he or she will be connected to the PA CareerLink® system for job placement assistance. All activities are aimed at increasing the skills and employability of TANF recipients so that employers are able to hire them.

TAA: TAA eligible workers are provided services and benefits to assist them in returning to the workforce in the shortest period of time. Services and training provided ensure that TAA recipients have the skills needed to find reemployment within the industry they were laid off from or to enter a new industry where employment opportunities exist.

JVSG: Through the JVSG program, Disabled Veterans Outreach Program (DVOP) Specialists assist veterans with significant barriers to employment such as long-term unemployment, previous incarceration, and low-income status. Another element of the program is carried out by Local Veterans Employment Representatives (LVERs) who meet with employers, plan and participate in job and career fairs and conduct job development with employers on behalf of veterans. LVERs work with the PA CareerLink® BSTs in promoting qualified veterans to employers seeking candidates.

SCSEP: SCSEP promotes part-time employment opportunities in community serve activities for unemployed low-income persons who are age 55 or older and who have poor employment prospects. SCSEP utilizes labor market information to identify occupations most likely to hire older workers and prepares participants for those jobs. Some SCSEP grantees already work with PA CareerLink® BSTs to develop employment opportunities for older workers; additional partnerships with BSTs will be pursued. Employers often desire to hire older workers, who are generally viewed as reliable, loyal and ethical with well-established critical thinking, leadership, teamwork and communication skills.

CSBG: CSBG funded programs provide opportunities for participants to attain basic soft skills, occupation-specific skills and work experience necessary to meet employer talent needs.

REO: Increased collaboration and alignment of reentry planning and service activities among system partners can improve the justice-involved individual's ability to attain and retain a job that pays family-sustaining wages. Efforts described in the Combined State Plan will allow for greater coordination of services and activities provided by REO grantees with the workforce development system. Activities seek to not only get the justice-involved individual employed, but to provide the necessary supports to allow employment retention, thus reducing turnover and costs for employers providing job opportunities to justice-involved individuals.

Service delivery is coordinated and integrated among core and partner programs in a number of ways. One method of integration is the proliferation of PA CareerLink® centers, Pennsylvania's one-stops, across the commonwealth. PA CareerLink® offices are the physical locations where, at a minimum, the services associated with each WIOA-mandated partner's core programs are provided. In addition, many partner program services, such as post-secondary recipients required under Pennsylvania's Perkins plan and TANF programs, can also be accessed through the PA CareerLink® offices. Integration of PA CareerLink® service delivery is critical for effective and efficient service to customers. All partners have itemized the types and availability of services to be provided in the PA CareerLink® Partner Agreement.

Within the PA CareerLink®, program staff is aligned functionally, rather than by program. Aligned functions include: welcome function to include the greeting and initial intake and assessment of customers; skill and career development function to include the provision of career and training

services; and business services function to include building relationships with employers through regional initiatives, including but not limited to sector partnerships, business alliances and identifying opportunities to address the human resource needs of employers. This alignment offers direct access to a broader range of services that can be adapted and leveraged to address each customer's unique needs.

Coordinated service delivery will also be achieved through the development of career pathways as described in Goal 1. Career pathway development will be led by Local Workforce Development Boards, in partnership with employers, multi-employer workforce partnerships, secondary and postsecondary education providers, Title I, adult basic education and vocational rehabilitation program providers and other combined plan partner programs capable of providing supportive services, such as TANF. Goal 1.4 stresses cross-program funding and programmatic integration of workforce preparation activities to develop soft-skills, adult basic education and occupational training, supplemented by supportive services, as part of career pathways models to facilitate access for individuals with barriers to employment. Goal 1.5 emphasizes co-enrollment of individuals in core and other partner programs as another means of achieving the best outcomes for those with barriers.

It is also imperative that the workforce system is responsive to the employment needs of employers. Goal 4 focuses on engaging employers as critical partners in the education and workforce system, not just end-users. One established method of identifying and responding to the needs of employers is through the Industry Partnership program. Industry Partnerships were funded initially to deliver incumbent worker training because that was where employers saw the biggest gaps. Moving forward, Industry Partnerships will also be used to address other common workforce challenges faced by employers to include finding qualified entry-level workers, recruitment of low-income individuals and workers from other targeted groups, including veterans and individuals with disabilities, and the re-employment of dislocated workers within an industry sector. Pennsylvania will also place additional emphasis on establishing new and expanding existing Registered Apprenticeship programs as a means of addressing employer talent needs. The recently established Pennsylvania Apprenticeship and Training Office will work closely with Combined State Plan core and partner programs to promote and support pre-apprenticeship and Registered Apprenticeship programs as part of relevant career pathway models.

Business Service Teams (BSTs) in the PA CareerLink® centers work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring candidates for on-the-job or customized training where the referred individual is not immediately ready to take on the full duties of the position. BSTs also have access to a plethora of labor market information that can be helpful to employers in setting wages and benefits that will attract high-quality candidates. BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post-secondary providers who can serve as a source of talent for employers.

Further detail regarding the alignment of programs, to include program alignment and how services are coordinated for both individuals and employers, can be found in the Operational Planning Elements section of the Combined State Plan.

B. STATE STRATEGIC VISION AND GOALS

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

1. VISION

Describe the State's strategic vision for its workforce development system.

On July 22, 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA) providing a framework for Governors and states to make changes to their workforce systems. The federal law sets the parameters for the workforce system which is an integral part of the commonwealth's ability to serve job seekers and employers. WIOA will enable the commonwealth to align workforce priorities across multiple partners, training providers, employers and others to ensure we are creating a skilled workforce for today and the future.

An effective workforce development system will be built on a foundation of alignment, innovation, employer engagement, accountability structures and improved data. Pennsylvania will look beyond WIOA to set broad goals for a comprehensive workforce development system that increases the number of "jobs that pay," expands the number of "schools that teach" the skills necessary to succeed in college and careers, and is a model of "government that works." We will do this by designing and implementing a workforce development system that addresses three core challenges facing the workforce system:

• The workforce system in general, and education and training providers in particular, are not well aligned with the needs of employers who provide jobs that pay.

• Too many workforce programs operate in their own individual silos rather than being integrated into an overall system that allows leveraging multiple funds to better serve employers, job seekers and incumbent workers.

• The workforce system lacks a support structure of training programs and employer peer–learning opportunities, including apprenticeship programs and Industry Partnerships, which enables and encourages more employers to invest in their workers and implement best organizational practices that create more jobs that pay.

Pennsylvania will provide the highest quality of service to job seekers, incumbent workers and employers by addressing these challenges through well–coordinated approaches at the state and local levels. System access will be enhanced through the use of technology and creative partnerships with community organizations and other service providers. While access will be improved for all job seekers and incumbent workers, the provision of services and training will be focused on those most in need and hardest to serve.

2. GOALS

Describe the goals for achieving this vision based on the above analysis of the State's economic conditions, workforce, and workforce development activities. This must include—

- Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers of employment* and other populations.**
- Goals for meeting the skilled workforce needs of employers.

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* Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

** Veterans, unemployed workers, and youth and any other populations identified by the State.

Our five broad goals for the commonwealth's workforce development system are:

• Establish career pathways as the primary model for skill, credential and degree attainment and provide all Pennsylvanians, with an emphasis on Pennsylvanians with barriers to employment, an opportunity to obtain a job that pays.

• Expand public–private investment in the state's pipeline of workers and in incumbent workers for targeted industry sectors from entry–level skills to middle skills through Industry Partnerships, WEDnetPA, and other innovative strategies.

• Increase opportunities for all youth to participate in work based learning through summer employment, pre–apprenticeship, apprenticeship, internships and other similar experiences.

• Engage employers through multi–employer workforce partnerships to improve the connection and responsiveness of workforce programs to the demand side of the labor market, increase public–private investment in critical skills, and support the spread of employer practices that create jobs that pay.

• Strengthen data sharing across state agencies and workforce development partners to better understand education and employment outcomes and rely more effectively on data to improve and target our efforts.

A key factor in accomplishing our five broad goals will be to boost interagency cooperation on workforce issues to achieve a team effort to implement this WIOA plan and to amend it if and when necessary. The development of this WIOA State Plan is the starting point for an unprecedented effort in Pennsylvania to transcend the fragmentation of workforce programs. Overcoming silos and promoting program integration are easy goals to talk about but very difficult to achieve. In Pennsylvania today, however, the commitment to achieving these goals – to getting all workforce agencies and programs pulling toward unified goals and better outcomes for job seekers, incumbent workers, employers, and all Pennsylvanians – starts at the very top, with Governor Wolf. State

agencies will work together to leverage resources, both federal and other, to achieve Governor Wolf's Strategic Vision.

Goal 1: Establish Career Pathways: It is imperative that the workforce development system provide training for skills that lead to employment in High Priority Occupations (HPOs) or entry–level occupations that lead to HPOs. Career pathways must be diverse with multiple entry and exit points allowing individuals of varying abilities, including low–skilled adults and youth with multiple barriers to employment, to have realistic access to pathways. The commonwealth will look to support career pathways that help adults and youth advance among multiple occupations, advance within an occupation or move to a new occupation that has similar skills to a previous occupation. The strategies outlined below will support the establishment and promotion of career pathways, with an emphasis on providing access to those with substantial barriers to employment.

1.1 The commonwealth adopts the WIOA Section 3(7) definition of career pathways as follows:

The term "career pathway'' means a combination of rigorous and high–quality education, training and other services that:

(A) aligns with the skill needs of industries in the economy of the State or regional economy involved;

(B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the "National Apprenticeship Act"; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an "apprenticeship", except in section 171);

(C) includes counseling to support an individual in achieving the individual's education and career goals;

(D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

(E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;

(F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

(G) helps an individual enter or advance within a specific occupation or occupational cluster.

1.2 Local Workforce Development Boards (LWDBs), in partnership with employers, multi–employer workforce partnerships, and secondary and postsecondary education providers, will develop career pathway programs meeting the requirements of WIOA. Career pathway programs will include adult basic education (literacy and numeracy, English–as–Second Language, and high school equivalency instruction) and will permit participants to enter at any of these levels in addition to entering at the postsecondary level.

1.3 The commonwealth will create a comprehensive career pathway system that combines education, training, counseling, and support services from multiple programs, including secondary and postsecondary career and technical education, adult and literacy education, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) Employment and Training, and higher education financial assistance, in addition to core programs of WIOA.

1.4 The commonwealth will encourage cross–program funding and programmatic integration of workforce preparation activities to develop soft–skills, adult basic education, and occupational training, supplemented by supportive services, as part of career pathway models to ensure that the critical needs of individuals (including those with basic skills deficiencies) are met, allowing the greatest opportunity for employment success. When appropriate, job seekers will be co–enrolled between two or more core programs to accomplish this goal. In addition, integrated systems must incorporate customer–centric design components, where possible.

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

1.6 The commonwealth will promote and support the creation of pre–apprenticeship and Registered Apprenticeship programs, particularly in non–traditional occupations and for non–traditional populations, as part of relevant career pathway models. The commonwealth will add apprenticeship opportunities to the JobGateway® and Commonwealth Workforce Development Systems (CWDS) and will promote them as job/training options to job seekers.

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

1.8 The commonwealth will maintain a robust Eligible Training Provider List (ETPL) to include performance data for all students receiving training in all programs, regardless of the funding source for those students’ training. This will allow for informed customer choice in selecting training programs and training providers. The commonwealth will ensure that there are a sufficient number of training providers serving individuals with barriers to employment on the ETPL.

1.9 The commonwealth will establish statewide and regional lists of industry–recognized credentials with a focus on identifying credentials along established career pathways, including badges, micro–credentials and entry level credentials appropriate for individuals with barriers to employment. The lists will include academic credentials as well as credentials demonstrating job readiness and the attainment of “soft skills” through workforce preparation activities. The commonwealth will consult with LWDBs and engaged employers, including through Registered Apprenticeship programs and Industry Partnerships, to ensure that the credential lists reflect skills that are in demand.

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

1.11 The commonwealth will enhance career guidance and navigation services to guide individuals, particularly individuals with barriers to employment and education, into programs and services that will provide them with an effective pathway to their career goals. The commonwealth will add information to JobGateway®, CWDS and the workforce development website regarding career pathways and will enhance information provided by the Department of Education around initiatives such as Students Occupationally and Academically Ready (SOAR). SOAR programs lead students into career pathways that align secondary education courses to postsecondary programs to complete a degree or certificate.

Goal 2: Invest in Talent and Skills for Targeted Industries in Strategic Partnership with Employers and Educational Institutions: The commonwealth will use data and work with employers to identify the skills and competencies necessary to attain family–sustaining employment and will offer high quality training to individuals to obtain those skills. Today, it is estimated that just 48 percent of Pennsylvanians have a college credential or industry–recognized certification. By 2025, it is projected that fully 60 percent of good–paying, reliable Pennsylvania jobs will require these credentials. Governor Wolf has established a goal of 60 percent of Pennsylvanians in the labor force will have postsecondary credentials or certificates by 2025 in order to meet expected demand. Concerted efforts will be made to ensure that individuals with barriers to employment are among those obtaining postsecondary credentials and certificates. The governor has also targeted that at least 85,000 individuals per year will be trained through Department of Community and Economic Development (DCED) and Department of Labor & Industry (L&I) training programs. Additional strategies and initiatives to grow the talent pool include:

2.1 The commonwealth will establish minimum spending requirements for how much local area funding must be used for training. Spending requirements will be established based on WIOA Title I allocations, excluding administrative funds. Local areas may use a variety of funding sources beyond Title I funds to meet spending requirements to include: other federal funds, such as TANF, Vocational Rehabilitation, National Dislocated Worker grants, and other federal discretionary grants; state funds, such as Industry Partnership funds and state discretionary grants; and local funds, such as county or city training programs, local industry partnership funds used for training and philanthropic funded training programs. In Program Year (PY) 2016, the training benchmark will be calculated as 30 percent of Title I funding; in PY 2017, the training benchmark will be calculated as 40 percent of Title I funding; and in PY 2018 and thereafter, the training benchmark will be calculated as 50 percent of Title I funding. Additionally, in PY 2016, at least 50 percent of funds utilized to meet the training benchmark must be spent on low income individuals and individuals with other barriers to employment, with the percentage rising to 60 percent in PY 2017 and 70 percent in PY 2018 and thereafter. A formal policy to include a definition of training and the funding sources which can be counted toward training benchmarks will be issued by the commonwealth. The policy will provide a process for local areas to request that additional training types and models count toward meeting the targets. Additionally, the commonwealth will establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. The commonwealth will reassess training benchmarks and training funds targeted to individuals with barriers to employment on an annual basis.

2.2 The commonwealth will direct state workforce dollars through the Reemployment Fund and other sources, and will seek federal discretionary grants, to support program innovation to better meet the needs of the hardest to serve populations.

2.3 The commonwealth will promote and develop sector strategies based on labor market information and employer need. This includes supporting the growth and expansion of the Industry Partnership program through increased state investment.

2.4 The commonwealth will expand access for adult workers to skill certifications via incumbent worker training programs such as those provided by Industry Partnerships (IPs) and WEDnetPA. The IP and WEDnetPA programs will be more closely aligned and coordinated to ensure the commonwealth is adequately serving entry–level workers and workers with more advanced training needs to support their upward mobility along career pathways.

2.5 The commonwealth will expand access to online education and training programs that result in industry–recognized credentials.

2.6 The commonwealth will work with employer partnerships, community colleges, secondary schools and LWDBs to establish micro–credentials that demonstrate job readiness, the attainment of "soft skills," and measurable skill gains aligned to career pathways for individuals with barriers to employment. A component of this effort will include sharing best practices with the intent of scaling the effort statewide. This work will be supported by a Workforce Innovation Fund (WIF) grant received from the U.S. Department of Labor.

2.7 The commonwealth will promote the development of Registered Apprenticeship programs, with a focus on non–traditional industries and occupations through state grant funds. The grant will also support efforts of existing Registered Apprenticeship programs to recruit female and minority apprentices. The Apprenticeship and Training Office (ATO) will provide technical assistance to grantees and will promote the creation and growth of apprenticeship programs beyond the grantees.

2.8 The commonwealth will continue to foster relationships between the workforce development and post–secondary and secondary education systems, and public library system to ensure system alignment, programs of study that support job seeker and employer needs, and leveraging of resources to provide students with the best possible chance for success. This includes continuing to look for ways to partner with education through competitive grant opportunities.

2.9 The commonwealth will provide priority of service to veterans and eligible spouses, recipients of public assistance, other low–income individuals and individuals who are basic skills deficient as mandated by WIOA. Per federal guidance in Training and Employment Guidance Letter 03–15, veterans and eligible spouses who are also recipients of public assistance, low income or basic skills deficient will receive first priority, non–veterans who are recipients of public assistance, low–income or basic skills deficient will receive second priority, veterans and eligible spouses not included in priority groups will receive third priority and all other individuals will receive last priority. Priority means the right to take precedence over non–covered persons in obtaining services. Depending on the type of service or resources being provided, taking precedence means: the covered person receives access to the service or resource earlier in time than the non–covered person; or, if the service or resource is limited, the covered person receives access to the service or resource instead of or before the non–covered person. Providing priority of service also entails affirmative outreach to the priority populations, identifying covered individuals at entry and informing them of their priority status. The commonwealth will also focus efforts on those with barriers to employment, including

those with the following barriers as defined in WIOA: displaced homemakers; Indians, Alaskan Natives and Native Hawaiians; individuals with disabilities including youth with disabilities; older individuals; ex–offenders; homeless individuals; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals with low levels of literacy and individuals facing cultural barriers; eligible migrant and seasonal farmworkers; individuals within two years of exhausting lifetime eligibility under TANF; single parents to include single pregnant women; and long–term unemployed individuals. The commonwealth will seek to obtain grants to assist in serving individuals entitled to priority of service and will additionally make discretionary state funds available to support the serving of these target populations.

2.10 “Employment First” will be the policy of all commonwealth executive branch agencies under the jurisdiction of the governor in serving persons with disabilities. This policy reflects the Governor’s goal of making the commonwealth a model state when it comes to creating a climate hospitable to workers with disabilities. The definition of Employment First is that competitive integrated employment is the first consideration and preferred outcome of publicly–funded services for all working–age Pennsylvanians with a disability. Career, training and supportive services will be used, as necessary, to support the placement of individuals with disabilities into competitive integrated employment.

2.11 The commonwealth will develop and implement integrated education and training models that provide accelerated learning opportunities for youth and adults lacking a high school credential and/or who are basic skills deficient.

Goal 3: Increase Work–Based Learning Opportunities for Youth: Unemployment rates for older youth and young adults remain substantially higher than those for the population as a whole. For example, although Pennsylvania’s overall unemployment rate has fallen to a seasonally adjusted 5.1 percent (as of October 2015), the rate for 20–24 year–olds stands at 11.1 percent, and at 13.4 percent for 16–19 year–olds. Further, because the likelihood of employment is highly correlated with educational levels, rates of employment and labor market participation for individuals with secondary credentials or less are substantially lower than for those with postsecondary credentials.

Recognizing the employment challenges faced by older youth and young adults, particularly those without postsecondary credentials, Congress and the Obama Administration prioritized WIOA employment, education and training services for 16–24 year–old out–of–school youth (OSY), establishing an expenditure floor of 75 percent, reducing the burdens of income determination, and extending automatic eligibility for services to a range of high–risk populations.

Appreciating the importance of preparing all Pennsylvanians for active and productive citizenship, the Wolf Administration will lead and support efforts by the commonwealth’s local boards to expand services to these high–risk young people. In particular, consistent with provisions of the statute and the Notice of Proposed Rulemaking, the commonwealth will place a strong emphasis on ensuring that eligible OSY have access to a full range of services across core programs, as appropriate. To ensure a strong and continuing focus on youth employment within each local workforce area, the commonwealth will also require local areas to have youth standing committees. In addition, the commonwealth will work closely with each LWDB to negotiate levels of performance that reflect the needs and challenges of the new service population. In this way, local areas will be not be penalized for enrolling high–need and difficult to serve individuals who are the focus of WIOA youth activities.

The commonwealth will further support local efforts by ensuring that state agencies overseeing local and regional programs that focus on high–risk young people, including those who are in foster care

and/or juvenile justice systems, are homeless, are involved in the public mental health system, or are pregnant or parenting, work together to build coordinated approaches that support local areas' efforts to enroll and retain these young people. Furthermore, the commonwealth will support training activities that help to equip PA CareerLink® staff with the information and skills they need to meet the needs of eligible youth.

WIOA also places a new emphasis on providing eligible youth with high–quality work experience, requiring that at least 20 percent of youth funding be dedicated to this activity. This requirement is consistent with a growing body of research which demonstrates that young people who have access to jobs in their teens tend to graduate from high school, earn secondary and postsecondary credentials and earn at higher levels than their peers who do not work. However, research also shows that young people in low–income families have much more limited access to employment than their more affluent peers. Therefore, the WIOA work experience requirement represents a powerful tool to help lower–income youth, particularly those with barriers to employment, to gain invaluable and potentially life–changing experience in work places. In support of this priority, the commonwealth will work closely with LWDBs to encourage employers to provide access to high–quality work experiences for eligible youth, including internships, workplace learning, transitional jobs, pre–apprenticeships, and summer jobs, with particular emphasis on OSY. These opportunities will be targeted to OSY as required by WIOA. Additional efforts will be made around career exploration strategies to provide students and their parents' access to key information in making decisions about secondary and postsecondary education options and employment goals.

Specific initiatives to support opportunities for youth are as follows:

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

3.2 The commonwealth will support the development of transitional jobs, social enterprises and other work experience strategies to help OSY with limited work histories to develop the skills needed for workplace success.

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

3.4 To ensure that OSY have access to career pathways, the commonwealth will work with local boards to identify on–ramps, access points, and supports which enable participants to enter and successfully complete training and enter employment.

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

3.6 The commonwealth will leverage existing low–literacy tools and models for OSY who are basic skills deficient and far from proficiency in reading and math.

3.7 The commonwealth may use a portion of the governor's set–aside funds to identify and replicate proven models for high–risk OSY, including models that incorporate demand–driven strategies and Industry Partnerships and other multi–employer workforce partnerships.

3.8 The commonwealth will encourage the co–enrollment of high–risk OSY, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to allow for the leveraging of funds and provision of necessary services. Where appropriate, co–enrollment in Title II adult basic education services, EARN, TANF and other partner programs will also be encouraged. The commonwealth will offer technical assistance and effective–practice sessions to ensure the co–enrollment of OSY in WIOA Adult and WIOA Youth programs and to promote their co–enrollment in partner programs. The commonwealth will also continue to encourage the use of Individual Training Accounts (ITAs) for 18 to 24 year old youth, potentially combined with, either sequentially or concurrently, work–based learning opportunities. TANF, SNAP and other partner programs will refer clients for ITAs, as appropriate.

3.9 In recognition of the focus of federal Title I funds on OSY, the commonwealth will leverage TANF Youth Development Funds to increase summer employment opportunities for in–school youth. In PY 2015, the commonwealth invested nearly $1.1 million to allow the Learn and Earn program in Allegheny County to pilot STEM initiatives in the fields of Video Game Production, Digital Manufacturing, Website Production and Agile Robotics. An additional $2.3 million was provided to Philadelphia to enhance its WorkReady Philadelphia Summer Employment programs and serve an additional 529 youth. The expansion is aligned with President Barack Obama's My Brother's Keeper initiative and Philadelphia's My Brother's Keeper Challenge.

3.10 The commonwealth will expand opportunities for youth to acquire post–high school skills and credentials needed for high wage jobs through increased access to career and technical education programs and work–based learning experiences. The Departments of Education and Labor & Industry will work cooperatively to explore and develop appropriate connections between WIOA youth activities and Perkins postsecondary and state–funded programming.

3.11 The Department of Education (PDE) will make additional funds available to support the transformation and modernization of career and technical education (CTE) and align CTE with the career pathways recognized by the commonwealth.

3.12 The Office of Vocational Rehabilitation (OVR) will continue to support initiatives serving transition–age youth with disabilities, such as: the Early Reach initiative designed to reach youth with disabilities earlier in their secondary school enrollment and make them aware of OVR services and how they can leverage general and special education programming to assist in transitioning from secondary education to employment and postsecondary education; the Access College – Employment Success grant awarded to D.R.E.A.M. Partnership to create college–based certificate programs for young adults with intellectual disabilities; Project SEARCH, a work–readiness program for secondary school youth providing on–the–job work experience through rotational internships; the Promoting Academic Success (PAS) program, a one–credit college course for students with disabilities to help them see if postsecondary education is an appropriate goal; and the Summer Academy, a three–week intensive training on the Penn State University campus for students who are blind or visually impaired who plan to attend college. Additionally, OVR will collaborate with employers to provide opportunities to students and youth with disabilities for career exploration that would lead to competitive, integrated employment. Students and youth with disabilities will also be given opportunities to complete work–based learning experiences to develop soft skills and work–related skills and experience.

3.13 The commonwealth will use the ATO to promote apprenticeship and pre–apprenticeship opportunities to youth.

3.14 The commonwealth will support LWDB collaboration with YouthBuild, JobCorps, and AmeriCorps sites and will require inclusion of those partnerships in local plans.

Goal 4: Engage Employers to Strengthen the Connection of Education and Training and the Economy, Increase Investment in Critical Skills and Increase Jobs that Pay: Employers must be partners in the education and workforce system, not just end–users. It is critical for employers to be at the table to offer insights into current and future skill and occupational needs and provide feedback on proposed and implemented career pathways, sector strategies and training programs. It is also imperative that the workforce development system engage the right employers – those offering jobs with reasonable wages, benefits, full–time stable employment, ongoing training and advancement opportunities, paid sick days, family leave and medical leave, and predictable schedules to balance family needs. Low–quality jobs have high turnover rates and limited opportunity for advancement, bringing into question the return on investment of limited WIOA resources. In addition, by engaging employers that provide good jobs by the standards of their sector, the commonwealth can support formal training, and formal and informal peer learning, that grow these companies and increase the number of other employers that adopt good human resource practices.

It is also critical that the commonwealth support employers who want to come together to address their training and human resource challenges in a more efficient, multi–employer way. The fragmentation of employers when it comes to workforce issues – recruitment, training, curricula, credentialing, career pathways – makes it more difficult for workforce services to align their programs with the common needs of employers. Pennsylvania is already ahead of other states in strengthening the voice of groups of employers in workforce development through its national leadership in building Industry Partnerships as well as its extensive investment in multi–employer apprenticeships. The commonwealth will build on its past experiences in order to improve employer engagement with the workforce system.

The commonwealth will measure employer engagement through the yet to be defined federal measure and will also consider additional state specific measures, such as market penetration (the number of employers actively using the public workforce system) or the number and total employment of employers engaged with active Industry Partnerships, apprenticeship programs, or other multi–employer workforce partnerships.

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

4.2 The commonwealth will seek to identify sustainable public and private funding, in addition to the annual state appropriation, for high–quality industry–driven sectoral workforce intermediaries, including Industry Partnerships and apprenticeship programs, to lock in on a permanent basis a

strong connection between education and training programs and the demand side of the labor market.

4.3 The commonwealth will implement a program of capacity building, peer learning, and evaluation to support Industry Partnerships, apprenticeship programs, and other multi–employer workforce intermediaries in delivering greater value to employers; job seekers; incumbent workers and new hires, including young people and rehired dislocated workers; adults and youth participating in work–based learning at the companies and/or hired by the companies; and to their industry and regional economies. The commonwealth will consider establishing a formal certification program for Industry Partnerships.

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

4.5 The commonwealth will set new standards for providing products and services to employers through enhanced agency coordination in providing business services and expanded partnerships with economic development providers, local chambers of commerce and other associations serving the needs of employers. State agencies may act as intermediaries for organizing outreach to employers on a wider geographical basis than local regions. WIOA Regional Plans will be required to include strategies for collaborating with economic development and employer partners.

4.6 The commonwealth will continue to encourage employers to participate in Business–Education Partnerships. These partnerships connect schools, employers, and youth–serving community organizations with students and OSY to provide career–related experiences and exposure opportunities for youth and young adults through soft skills development, internships, workplace shadowing, and career mentoring. When possible, Business–Education Partnerships will recruit business representatives from Industry Partnerships, apprenticeship programs, or multi–employer groups that identify common workforce needs of businesses that provide jobs that pay. Industry Partnerships will also be leveraged to provide educator in the workplace opportunities for teachers and other educational system professionals.

4.7 The commonwealth will build new and strengthen existing partnerships with employers to increase work–based learning experiences such as internships and apprenticeships that provide job seekers with the skills and credentials necessary to secure and advance in employment with family–sustaining wages. The commonwealth will encourage employers that receive state funds from economic development and other programs to utilize the public workforce development system and will give priority to employers providing high–quality jobs or jobs that are likely to lead to high–quality jobs.

4.8 The commonwealth will rely on partnerships of employers to validate the credentials developed as part of state and regional lists of recognized credentials, career pathways, and other statewide efforts.

4.9 The commonwealth will streamline and standardize On–the–Job Training (OJT) contracts to provide greater consistency across LWDBs for employers hiring in multiple areas.

4.10 The Office of Vocational Rehabilitation will continue to provide leadership for accessibility standards, disability talent recruitment, on–boarding expertise and disability etiquette training for employers.

4.11 The commonwealth has recently partnered with the PA Chamber of Business and Industry (Chamber) which administers a workforce development survey sent to Pennsylvania employers. The commonwealth will foster this relationship in order to gain new and enhanced insights into workforce challenges and needs of Chamber members. As a complement to this Chamber partnership, the commonwealth will develop a dedicated survey unit focused on soliciting targeted employer input on a wide and diverse range of workforce issues as well as gauging the labor market from the employer perspective. Survey results will be used for strategic planning, measuring impact, and discovering opportunities.

4.12 Governor's Office and agency executives will regularly meet with business leaders around the state through efforts like the Jobs that Pay Tour to solicit feedback and ideas from employers.

Goal 5: Strengthen Data Sharing and More Effectively Use Data: Investments in workforce development programs will be made based on data and return–on–investment analysis. Use of rich data will allow for continuous improvement of programs. The sharing of program information, to include common measures and other outcome data, will allow for more informed customer choice in considering programs. The governor, in consultation with the state Workforce Development Board (WDB), will establish additional performance measures which will allow for assessment of the system to drive improvement and outcomes. The commonwealth will also work with federal agencies and local boards to ensure that negotiated performance levels reflect the populations being served, particularly with regard to OSY and other high–risk youth and adults with barriers to employment. The WDB will develop a dashboard to track progress and success on State Plan goals and implementation.

5.1 The commonwealth will expand upon Workforce Data Quality Initiative (WDQI) efforts to add additional state agencies and data sets to the database, with particular focus on PDE longitudinal educational data and agencies such as the Department of Transportation, Department of Corrections and Department of Revenue, who can assist in validation of data.

5.2 The commonwealth will make efforts to use WDQI as the common performance measurement reporting tool across all core programs.

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

5.4 The commonwealth will regularly conduct formal evaluations of the state's workforce development system, including the system's effectiveness in meeting employer skill needs and increasing the educational attainment, employment and earnings of program participants.

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

5.6 The commonwealth will seek to find ways to identify supply/demand gaps to further inform workforce policies.

5.7 The commonwealth will collaborate with the State WDB to develop a dashboard to track progress on the implementation of the WIOA State Plan and achievement of the plan's goals. This dashboard will aim to focus attention on the plan's big–picture, long term goals. Some measures under consideration for inclusion in the dashboard are the share of the working–age population with postsecondary credentials or certificates, employer investment in skills, and the overall Pennsylvania labor turnover rate. The first is a priority of Governor Wolf and a measure on which Pennsylvania historically ranks poorly (between 43rd and 49th in the last dozen years). The last two measures would measure the effectiveness of the state's WIOA plan at identifying and spreading best practices that help employers increase the number of jobs that pay.

The work of local workforce development boards will support and further the governor's five goals for the workforce development system. In recognition that many system innovations originate at a local level, the commonwealth made available state discretionary funds, through a Strategic Innovation Grant opportunity, providing broad latitude for LWDBs to propose creative and innovative strategies to support the five goals outlined in the Combined State Plan.

3. PERFORMANCE GOALS

Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

See Appendix I

4. ASSESSMENT

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

Investments in workforce development programs will be made based on data and return-on-investment analysis. Use of rich data will allow for continuous improvement of programs. The sharing of program information, to include common measures and other outcome data, will allow for more informed customer choice in considering programs. The governor, in consultation with the state Workforce Development Board (WDB), will establish additional performance measures which will allow for assessment of the system to drive improvement and outcomes. The commonwealth will also work with federal agencies and local boards to ensure that negotiated performance levels reflect the populations being served, particularly with regard to OSY and other high-risk youth and adults with barriers to employment. The WDB will develop a dashboard to track progress and success on State Plan goals and implementation.

C. STATE STRATEGY

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. DESCRIBE THE STRATEGIES THE STATE WILL IMPLEMENT, INCLUDING INDUSTRY OR SECTOR PARTNERSHIPS RELATED TO IN-DEMAND INDUSTRY SECTORS AND OCCUPATIONS AND CAREER PATHWAYS, AS REQUIRED BY WIOA SECTION 101(D)(3)(B), (D). "CAREER PATHWAY" IS DEFINED AT WIOA SECTION 3(7). "IN-DEMAND INDUSTRY SECTOR OR OCCUPATION" IS DEFINED AT WIOA SECTION 3(23).

Sector Strategies Pennsylvania has been engaged in sector–driven workforce activities for more than a decade. Industry clusters have been defined to enable data–driven workforce development policies.

An industry cluster consists of a group of industries that are closely linked by common product markets, labor pools, similar technologies, supplier chains, and/or other economic ties. Clusters can take on strategic importance because activities that benefit one group member will generally have positive effects on other members of the cluster. They are used to:

• Create a consistent definition that allows for workforce comparison across regions.

• Identify major employers for building Industry Partnerships.

• Provide a basis for occupational and skills analysis of shared workforce needs.

• Direct resource allocation for jobs in demand that will offer family–sustaining wages.

Currently the commonwealth concentrates workforce strategies around 12 industry clusters. These clusters account for nearly 82 percent of all employment in the commonwealth. Along with employment trends and average wages, the strength of a cluster is often evaluated using a location quotient (LQ) which compares a cluster's share of local employment with its share of national employment. A LQ greater than one implies a competitive advantage in an area. While the table looks at statewide LQs, many industries are highly regionalized and may have LQs well above statewide averages. Regional and local plans will pick up on this fact as actors develop local and regional priorities.

The clusters, sub–clusters and associated employment, LQ, and wages are listed below:

• Advanced Manufacturing (AM): 442,723; 1.04; $54,890

o Chemicals, Rubber & Plastics (AM – CRP): 74,101; 1.16; $55,378

o Electronics (AM – E): 65,725; 0.81; $60,236

o Metals (AM – M): 137,619; 1.46; $59,832

o Vehicles & Vehicle Equipment (AM – VVE): 165,278; 0.89; $48,432

• Agriculture & Food Productions (AFP): 170,139; 0.84; $43,739

• Bio–Medical (BM): 73,585; 1.14; $99,226

• Building & Construction (BC): 341,984; 0.96; $53,298

• Business Services (BSV): 709,118; 0.99; $79,327

o Media, Advertising & Marketing (BSV – MAM: 128,132; 0.89; $80,183

o Operational Services (BSV – OPER): 222,302; 0.94; $47,874

o Professional & Consulting Services (BSV – P&C): 358,684; 1.07; $98,515

• Education (ED): 555,857; 1.01; $47,679

• Energy (ENGY): 142,832; 1.13; $77,083

• Health Care (HC): 997,646; 1.21; $50,495

• Hospitality, Leisure & Entertainment (HLE): 588,413; 0.87; $19,391

• Logistics & Transportation (LT): 217,353; 1.13; $46,959

• Real Estate, Finance & Insurance (REFI): 293,301; 0.95; $79,296

• Wood, Wood Products & Publishing (WWP): 107,746; 1.23; $49,527

Equally important to Pennsylvania's sector strategy is the identification of occupations that are critical to the success and growth of the clusters and a policy to enable Pennsylvanians to acquire the necessary skills for those careers. The High Priority Occupation (HPO) policy establishes a process to identify those occupations that are in demand by employers, pay a family–sustaining wage and have higher skill requirements. Entry–level jobs that serve as an "on–ramp" to high–quality occupations may be considered as HPOs if the career pathway to existing HPOs is clearly documented. This innovative approach combines labor market data with regional stakeholder input allowing for a more complete picture of the actual workforce needs across the commonwealth. HPOs guide the allocation of training dollars for WIOA programs and select community college initiatives and equipment grants for career and technical education programs.

Industry clusters have also served as the basis for the creation of Industry Partnerships (IPs) – employer/worker consortiums that bring together companies with similar products, markets and human resource needs. The intent of IPs, through prudent investments, is for Pennsylvania to develop the human capital necessary for greater productivity, thereby helping these industries flourish while creating career opportunities for its workforce.

Pennsylvania was among the first states to extend training and career–building efforts beyond individual companies to networks of companies in specific industries. IPs foster industry collaboration on incumbent worker training, school–to–career and other workforce pipeline initiatives, career pathways, recruitment and retention, and other human resource challenges. These types of collaboration can help alleviate skill gaps in businesses, increase entry–level employment opportunities, and lead to the creation of more high–paying jobs.

Pennsylvania's HPO and IP processes have also served as a method of evaluating occupational workforce needs. Employer input received through regional stakeholders provides insight into potential skills mismatches. Some employers continue to struggle to fill critical workforce positions while some individuals remain unemployed for extended periods of time or have difficulty finding employment. Many of the skills today's workers need are expected to be obtained through advanced education and training, resulting in relevant credentials that are valued by employers. However, feedback from many employers suggests that candidates lack the soft skills necessary to gain and/or maintain employment.

Pennsylvania's career pathway strategies are fully described in Goal 1 discussed in the "Goals" section of the State Plan.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2).

The commonwealth strives to consistently provide excellent service to workforce development customers, both individuals and businesses, in the 23 workforce development areas across the state. To that end, the commonwealth will establish minimum requirements for PA CareerLink® career services orientation, minimum requirements for PA CareerLink® basic career services customer flow, a customizable initial intake form, and a customizable template for developing Individual Employment Plans. In addition to ensuring a level of consistency across regions, these minimum requirements and standard forms will also support alignment of services across programs by reducing duplicate data collections and allowing partners to all work from the same basic customer information.

The commonwealth will also foster program and resource alignment by requiring each local workforce development area to establish local Memoranda of Understanding (MOUs) among, at minimum, the core programs, specifying how program eligibility will be determined and identifying what partners will deliver what basic and individualized career services. This will ensure there are clearly defined roles and responsibilities among the partner programs.

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

III. OPERATIONAL PLANNING ELEMENTS

The Unified or Combined State Plan must include an Operational Planning Elements section that support the State's strategy and the system-wide vision described in Section II.(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e. provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The Pennsylvania Workforce Development Board (PA WDB) is the governor's employer–driven workforce development advisor for programs and policies under WIOA, and serves in an advisory capacity for the implementation of the governor's workforce strategy.

The PA WDB is governed by bylaws. Members serve three–year, staggered terms. Standing and ad hoc committees are formed as necessary. The bylaws require members to accept the following duties and responsibilities:

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

2. Assist in preparation and planning efforts to effectively coordinate and integrate resources to achieve workforce and economic development goals. This plan will be developed jointly with the state departments which administer Pennsylvania's core training and education programs.

3. Actively participate on one or more of the board's standing or ad hoc committees.

4. Be available to visit with the executives of companies new to Pennsylvania in an effort to help them understand and become familiar with the resources of Pennsylvania's workforce and educational system.

5. Be available to meet with business executives, legislative leaders, labor representatives and economic development officials to emphasize the importance of smart investments in human capital.

6. Be generally familiar with Pennsylvania's federal and state workforce programs and the laws that govern them.

7. Attend at least two of the three annual meetings of the board.

8. Provide, as requested, critical feedback on the board's initiatives.

9. Encourage the involvement of businesses, organized labor, educational institutions and foundations in the commonwealth's workforce initiatives.

10. Be willing to provide the information required by the Pennsylvania Financial Disclosure and State Ethics forms. This is required annually of all board members.

11. Recuse themselves from their official board duties if there is a conflict of interest.

12. Advise the board of any potential conflicts of interest.

13. Ask the board for an opinion if they have any doubts that a specific situation involves a conflict of interest.

Official actions of the board, with the exception of bylaw amendments, must be supported by a majority of members. In the event of a quorum, all action will be taken by a vote of a majority of the members present. At meetings without a quorum, the board shall present and second a desired motion. After the meeting, a vote on the motion shall take place electronically. Should the motion pass, it shall be announced at the subsequent meeting. Amendments to the bylaws must be supported by a super–majority (three–quarters) of board members.

2. IMPLEMENTATION OF STATE STRATEGY

Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of—

A. CORE PROGRAM ACTIVITIES TO IMPLEMENT THE STATE'S STRATEGY

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies.

The core programs – Adult, Dislocated Worker, Youth, Adult Basic Education, Wagner–Peyser and VR – will work in concert to effectively serve job seekers and employers across the commonwealth. Strategies will be informed by robust labor market information gathered, analyzed and provided by CWIA and other sources. While each program has clearly defined activities to carry–out, as defined by law, it is through leveraging services and resources that optimum outcomes can be achieved.

The commonwealth's alignment of core programs will include establishing effective career pathways that combine guidance, education, training and support services that prepare individuals for careers. The pathway system will include coaches that help guide individuals to appropriate programs and services given their needs and career goals. The commonwealth will promote co–enrollment to align services and will encourage shared roles for guidance and support services within each career pathway program to prevent duplication of services among the core programs.

PA CareerLink® offices are the physical locations where, at a minimum, the services associated with each WIOA–mandated partner's core programs are provided. In addition, many partner program services, such as post–secondary recipients required under Pennsylvania's Perkins plan and TANF and SNAP programs, can also be accessed through the PA CareerLink® offices. Integration of PA CareerLink® service delivery is critical for effective and efficient service to customers. All partners have itemized the types and availability of services to be provided in the PA CareerLink® Partner Agreement.

Within the PA CareerLink®, program staff is aligned functionally, rather than by program. Aligned functions include: welcome function to include the greeting and initial intake and assessment of customers; skill and career development function to include the provision of career and training

services; and business services function to include building relationships with employers through regional initiatives, including but not limited to sector partnerships, business alliances and identifying opportunities to address the human resource needs of employers. This alignment offers direct access to a broader range of services that can be adapted and leveraged to address each customer's unique needs.

Comprehensive PA CareerLink® offices use a triage approach to service delivery. Persons seeking assistance through the system can access services online or in person. Staff is available to provide direct assistance to customers in both group and individual settings, and self–service resources are available in Career Resource Areas.

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

A brief discussion of the activities to be funded by each of the core programs and alignment strategies follows.

WIOA Adult: The Adult program is one of three Title I core programs authorized under WIOA designed to assist participants to attain employment. The Adult program is specifically targeted toward participants, age 18 or older, who are in need of employment or career advancement. Priority of service is given to participants deemed to be recipients of public assistance, other low–income individuals, and individuals who are basic skills deficient; if the participant is also found to be an eligible Veteran or spouse of a Veteran (Covered Person) the priority of service will be extended to the covered person.

Generally, two groups of services are made available through the Adult program (as well as the WIOA Dislocated Worker program). The first group of services is known collectively as career services and the second is training services. A participant who, after an interview, evaluation, or assessment, and career planning, is determined to be unlikely or unable to obtain or retain employment which leads to economic self–sufficiency or wages comparable to or higher than wages from previous employment, may be in need of training services. The participant must have the skills and qualifications to successfully participate in the selected training program and be eligible in accordance with the priority of service system.

WIOA Dislocated Worker: Dislocated Worker programs assist workers before or after layoff in identifying basic skills training, on–the–job or customized training programs and apprenticeship opportunities to help facilitate rapid reemployment. Dislocated workers are triaged at the point of entry to identify potential program eligibility. This initial intake and triage allows for the development of a streamlined service strategy that maximizes the funding of all entities in carrying out core reemployment activities. Job search and relocation allowances help eligible individuals to look for and obtain suitable employment outside of their normal commuting area when suitable employment is not available within their normal commuting area.

WIOA Youth: Youth programming is designed to serve eligible youth and young adults through high–quality case management support toward educational attainment that includes career guidance and exploration, the provision of summer and/or year–round work experience opportunities such as internships and pre–apprenticeships, and skills training along a career pathway for in–demand industries and occupations, along with any necessary supportive services. The ultimate goal for program participants is either advancement into post–secondary education or the attainment of employment with a family–sustaining or self–sustaining wage. Youth program services are prioritized for out–of–school youth (OSY) and youth with significant barriers to success, such as youth with a disability, pregnant or parenting youth, or those youth subject to the juvenile/adult justice system.

Wagner–Peyser: Wagner–Peyser staff provides employment services to job seekers and employers in PA CareerLink® centers. Services to job seekers include, but are not limited to: job search and job placement assistance; career counseling; needs and interest assessments; proficiency testing; workshops; development of an individual employment plan; and case management. Services to employers include assistance in developing and posting job orders, referral of qualified job seekers to job openings and organizing job fairs. Both job seekers and employers are also provided with robust labor market information to help inform their activities.

Adult Basic Education: Adult basic education is a critical partner in establishing career pathways for adults who are deficient in basic skills. Funded programs provide a full range of adult basic education services from beginning level literacy through high adult secondary and transition activities to support college and career readiness; these services include English language acquisition activities where needed. Programs provide basic skills instruction in the context of work readiness and incorporate workplace preparation activities and career awareness and planning in instruction and services. Programs provide case management services to their students in two key areas: 1) helping students address barriers to participation in adult basic education programing and 2) helping students prepare and plan for entry onto a career pathway through employment and/or postsecondary education/training. Case managers connect students with social services to address needs such as child care, transportation, housing, health care and others. They also provide information on employment and postsecondary education/training opportunities and assist students in completing the necessary steps to take advantage of those opportunities. These services support persistence and success in adult basic education services and connect students to partner programs and entities in the workforce development system.

Adult basic education program administrators and other staff develop relationships and partnerships at the local level to support alignment of adult basic education services with the services of the other programs and workforce development system partners to include working with local business service teams. Applicants for Title II funds will be required to describe how they will align services with the local workforce development plan. To support the commonwealth's goal of increasing opportunities for youth, funded programs will be encouraged to co–enroll out of school youth by providing basic skills instruction.

Funded programs will provide integrated education and training whenever possible and appropriate. Integrated education and training requires three components offered concurrently and contextualized to an occupation or occupational cluster: adult basic education, workforce preparation, and workforce training. To make this possible, the commonwealth will define the spectrum of services to be included in integrated education and training. Furthermore, the commonwealth will develop policy and guidance governing the use of Title I training funds and other funding sources to support the costs of the workforce training component of integrated education and training opportunities, including both pre–employment and incumbent worker training. Integrated education and training

activities will be aligned with local workforce needs, prepare students for realistic, existing employment opportunities, and be developed in consultation with LWDBs, employers, and training providers.

LWDBs are required to include a Title II representative to support overall alignment among core programs and other workforce development system partners. Per Sec. 107(b)(6) of WIOA, in local areas with more than one Title II provider, the Title II representative “shall be appointed from among individuals nominated by local providers.” PDE further requires its adult basic education providers to meet regularly to coordinate their services and to make a formal presentation to the LWBD at least annually.

Office of Vocational Rehabilitation (OVR): OVR provides vocational rehabilitation services to help persons with disabilities prepare for, obtain, or maintain employment. OVR provides services to eligible individuals with disabilities, both directly and through a network of approved vendors. Services are provided on an individualized basis. The OVR counselor, during face–to–face interviews, assists customers in selecting their choice of vocational goals, services and service providers. An Individualized Plan for Employment (IPE) is developed, outlining a vocational objective, services, providers and responsibilities. Counseling and guidance, diagnostic services, assessments, information and referral, job development and placement, and personal services such as readers or sign language interpreters are provided at no cost to the individual. OVR will continue to meet with individuals with disabilities and business representatives in the PA CareerLink® centers to provide vocational rehabilitation services and outreach. OVR will collaborate with partners in the workforce and education systems to develop strategies for streamlining and enhancing service planning and delivery.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The Pennsylvania workforce development system extends far beyond the core programs to include programs administered by numerous state agencies and quasi–governmental entities. An overview of major partners and programs is included below. Core and partner programs will collaborate to ensure that resources are leveraged and services are not duplicated.

An interagency work group has been established and meets on a regular basis to consider ideas, discuss agency initiatives and goals and how partner agencies can help in achieving them, and share best practices. The interagency work group is an ad hoc group comprised of executive and program level staff from the Departments of Aging, Education, Human Services, Labor & Industry, Agriculture, Community and Economic Development, Military and Veterans Affairs, and Corrections, as well as the Governor’s Office. The work group is coordinated by the Governor’s Office and led by the Deputy Secretary of Workforce Development within the Department of Labor & Industry. Additionally, DHS, DCED and the Department of Agriculture have recently added Special Assistants focused on workforce development initiatives, all of whom participate in the interagency work group and help in facilitating alignment of activities.

The State WDB is another body that works to promote alignment and collaboration across programs. The Secretaries of L&I, DCED, DHS, PDE and the Department of Agriculture all serve on the Board. Other agency secretaries are invited to participate in Board meetings when populations they serve are expected to be discussed, such as the Secretary of the DOC for discussions involving ex–offenders and re–entry programs, the Secretary of Aging when discussing older workers or the Secretary of the DMVA for discussions involving veterans. In addition to its other committees, the State WDB will retain a Youth Standing Committee that will provide leadership and information to Pennsylvania's local youth standing committees in promoting greater connections between workforce development boards, community organizations with experience and expertise in youth workforce preparation, and the young people that they serve.

There are numerous examples of specific collaborations among partner programs beyond the high level strategic and planning efforts taking place through the interagency work group and State WDB including:

• OVR works extensively with education partners including Local Education Agencies (LEAs) to coordinate the provision of pre–employment and other transition services for students with disabilities under the 15 percent reserve.

• The Secretaries of PDE, DHS and L&I will, working with other commonwealth agencies and executive office officials, create a written plan that implements Employment First as the policy of all commonwealth executive branch agencies; aligns funding, policy, and practice toward an emphasis on competitive integrated employment; prioritizes competitive integrated employment as the first consideration and preferred outcome of all publicly–funded services for all Pennsylvanians with a disability; and creates the conditions that lead to a material increase in the number of Pennsylvanians with a disability who are employed in a competitive integrated job.

• WIOA Youth service providers coordinate with LEAs, adult education agencies, county human service offices, county assistance office income maintenance caseworkers, Keystone Education Yields Success (KEYS) student coordinators, EARN contractors, juvenile justice and local law enforcement agencies, local housing authorities, OVR, economic development entities and other community and faith–based organizations to ensure Youth participants have access to all the services they need to be successful in training activities and find employment.

• WIOA Youth will be notified of opportunities to co–enroll in the TANF program and will also be referred to the Education Leading to Employment and Career Training (ELECT) program as appropriate.

• The braiding of WIOA Title I–B funded programs with other youth–directed state and local entities allows comprehensive services to be offered to all eligible low–income populations under WIOA. Available TANF funding will continue to support WIOA year–round services and summer employment activities.

• Applicants for Title II funds are required to describe how they will align services with local workforce development plans and how they will coordinate with other available education, training, and social services in the community.

• Perkins postsecondary providers assist job seekers in identifying their interests and abilities and aligning these skills needs to training and financial resources to assist with training. Training is linked

to the state's HPO list and is designed to lead to credential attainment. Both credential attainment and HPO alignment assist job seekers in securing employment with family–sustaining wages.

• The commonwealth co–enrolls all trade–impacted workers in the WIOA Dislocated Worker program to ensure that all individuals receive the full range of assistance available to dislocated workers.

• The Community Education Councils (CECs) network, as designated by PDE, will align training development efforts with the overarching strategies of the commonwealth to increase the education and training delivery to residents of rural communities.

• PDE will work with representatives from the PA Department of Corrections and other education stakeholders to identify best practices to support the requirements of Section 225 of Title II.

• The Pennsylvania Department of Corrections (DOC) is working closely with L&I, PDE, DHS, DCED and other partners to align its Career Pathways in Reentry Initiative with on–going efforts in the workforce and education systems.

• The DOC is partnering with LWDBs and PA CareerLink® service providers to build staff capacity in reentry employment and offender workforce development services.

• PDE will partner with the DOC to improve coordination of resources and systems at the state level, including providing professional development for Bureau of Correction Education (BCE) staff on key issues such as career pathways, rigorous academic standards, and the development of college– and career–ready skills. PDE's Bureau of Career & Technical Education (BCTE) offers regional meetings with secondary schools to discuss best and promising practices related to workforce readiness and will extend these opportunities to DOC BCE staff and others who are committed to improving educational and employment outcomes for students in the criminal justice system. In addition, PDE will work to connect DOC with institutions of higher education and other partners who can provide opportunities for offenders to enhance skills and earn post–secondary credentials.

• South Central WDB and local economic development entities cooperate to ensure better business health. Members of the local economic development group and representatives of the WDB meet with all new and expanding businesses within the region to discuss their future needs. From the workforce side this helps connect the WDB with new companies and can provide detailed information about current workers in the region as well as give the WDB the opportunity to learn about future needs. At the same time it also introduces the company to the local economic development system that can help to connect the business with programs that can help them continue to grow. This partnership helps to identify issues and create innovative solutions especially in a region where the demand for workforce is very high and can be competitive.

• The Area Agencies on Aging (AAAs) and nine national Senior Community Service Employment Program (SCSEP) sponsors refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in CWDS. PA CareerLink® staff reciprocates by referring SCSEP eligible individuals to the AAAs and SCSEP partners as appropriate. In some cases, SCSEP staff is co–located at PA CareerLink® centers on a full– or part–time basis. It should be noted that SCSEP is the largest federal workforce development program targeted to serve older workers.

• SCSEP sponsors seek to co–enroll participants in WIOA, OVR and veterans programs, as appropriate, to efficiently leverage available federal and state workforce development funds.

• When appropriate, SCSEP sponsors pursue the placement of SCSEP participants to serve as greeters, resource room aides, job developers, custodians, clerical aides and customer service representatives in PA CareerLink® centers.

• The Pennsylvania Workforce Data Quality Initiative (PA–WDQI) is an integrated data platform that links human service, workforce and wage record data to measure the outcomes of workforce development programs and identifies the supply of skilled workers in relation to employer demand. DHS and L&I were the initial partner agencies in the project with analysis of Adult, Dislocated Worker, Youth, Wagner–Peyser, TANF E&T and SNAP E&T program outcomes at the forefront of project goals. PDE is currently working with L&I to join the WDQI initiative and align PDE longitudinal data with L&I and DHS data.

• The PA Centers for Independent Living (CILs) play an important role in helping individuals with disabilities achieve or maintain independence through supportive services and programs, including four core services: information and referral, peer support, advocacy, and independent living skills. WIOA provides new opportunities for PA CareerLink® to partner with CILs leading to improved employment outcomes for job seekers with disabilities. The comprehensive services provided by CILs to advocate for and support the independence of individuals with disabilities is a perfect match with the focus of the public workforce system. CILs, OVR and PA CareerLink® centers are natural partners committed to improving the employment and economic advancement of all job seekers, including in–school and out–of–school youth and adults with disabilities through collaboration.

• The PA Link to Aging and Disability Resources (PA Link) is a resource for elderly Pennsylvanians and adults with disabilities. The PA Link, through its collaborative network of partners including state and local public and private agencies improves access to information and provides referrals to long term living supports and services. Examples of services accessible through the PA Link network include assisted living and nursing home services, vocational rehabilitation services and transportation services.

• OVR has collaborated with Penn State's AgrAbility Program and the U.S. Department of Agriculture in developing the Farming and Agriculture Rehabilitation Management (F.A.R.M.) policy to address the rehabilitation needs of farmers and ranchers with disabilities. VR counselors, with technical assistance and guidance from Pennsylvania's AgrAbility Program, are able to assess the rehabilitation needs of farmers and ranchers with disabilities in order to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.

• OVR continues to build new and strengthen existing partnerships with the Department of Corrections, regarding increasing and improving the agency's involvement in re–entry employment training to assist individuals with disabilities in the correctional system.

• L&I partnered with DCED to release a Notice of Grant Availability for the Sector Partnership National Dislocated Worker Grant to ensure job training strategies pursued under the grant are aligned with regional economic development strategies.

• The Fast Track to Employment initiative in Mercer County, supported by state grant funds, utilizes the six public libraries in the county to provide resources to job seekers to include career guidance, resume preparation assistance and information about schools, financial aid, scholarships, and internships. The commonwealth will look to further utilize libraries and other community based organizations as access points to the workforce development system. The commonwealth will

leverage the resources available in the over 600 public libraries across the state to include basic computer skills training and access to the Internet and other digital education resources.

• Through a recently approved Memorandum of Understanding (MOU) between L&I–OVR and DHS–Office of Developmental Programs, the agencies will pool their resources for the purpose of increasing the amount of financial resources available to assist individuals with intellectual disabilities secure and maintain community integrated employment; specifically, DHS–ODP will direct state funds in the amount of $500,000 to L&I–OVR so that L&I–OVR will use those state funds to match available federal vocational rehabilitation funds at the allowable federal–to–state–ratio. This collaborative effort between L&I–OVR and DHS–ODP promotes competitive employment for individuals with an intellectual disability and will allow the possibility of expanded job–training programs, paid work experience for high school students, employment demonstration projects, and family outreach. This MOU is dependent on the availability of funds and the pooling of financial resources is a year–to–year endeavor.

• The Pennsylvania Department of Agriculture invited representatives of groups interested in using agriculture education as a rehabilitation modality to come together to discuss existing programs and the possibility of collaborating to build new ones. The Department of Labor & Industry, the Office of Vocational Rehabilitation, the Department of Drug and Alcohol Programs, the Department of Corrections, the Department of Human Services, and providers of similar services in local areas gathered to discuss some best practice examples and the possibilities for replication around the commonwealth. This group plans to continue meeting on a regular basis under the leadership of the PA Department of Agriculture.

• The PA Department of Agriculture continues work with the Department of Education in administering agriculture education programs (a part of career and technology education) as well as the accompanying FFA programs and 4–H (in cooperation with Penn State University). The Department of Agriculture plans an evaluation of the agriculture education system in the commonwealth in conjunction with PDE and the Pennsylvania Association of Agriculture Educators in 2016.

• The PA Department of Agriculture invited representatives from the veterans' services system within state government and around the commonwealth to a meeting to discuss jobs in the agriculture and food industry as a career pathway for people returning to the job market from active duty. As a result, many of the participants will be participating in a career day for veterans during the 100th Farm Show on January 14, 2016. This informal collaborative group plans to continue meeting on a regular basis under the leadership of the PA Department of Agriculture.

• In the process of outreach to urban farming groups in Philadelphia and Pittsburgh, the PA Department of Agriculture discovered an interest in additional training for participants in urban farming projects. A meeting at the W.B Saul High School of Agriculture in Philadelphia drew representatives from 25+ groups into a conversation about technical training in soil remediation, season extension, and composting as well as formal apprenticeship programs. This collaboration will continue with meetings and tours planned on a regular basis. A tour of hydroponics and aquaponics sites is planned for early December.

• The Department of Military and Veterans Affairs –Office of Veterans Affairs (DMVA–OVA) will work to establish and participate in Regional Veterans' Employment and workforce development initiatives that are focused on combating veteran unemployment. DMVA will collaborate with the United States Department of Veterans Affairs, the Pennsylvania Department of Labor and Industry, the State Civil

Service Commission, other Veterans' service organizations and our community partners to lead efforts that improve veteran employment within the commonwealth. DMVA recognizes that the emerging needs of veterans and their families are unique within several distinct regions. DMVA will work with sister departments and community partners to develop regional initiatives that both maximize available resources and focus on the economic and industry needs within those defined regions. This initiative will include utilizing new and innovative techniques that help veterans develop required skills, prepare for job interviews and attain employment opportunities. DMVA will publicize efforts, provide systemic updates on new opportunities, share success and facilitate access to regional employment opportunities with the end goal to pair job seeking veterans with employers who are ready to hire.

The commonwealth will take further actions to coordinate services between WIOA core programs and non–core programs and services to create an effective career pathway system. These actions will include the following:

• The State WDB and LWDBs will work with education agencies and educational institutions to build career pathways that include secondary and postsecondary career and technical education programs of study. • The commonwealth will expand skill–building services funded through Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), including leveraging federal funding available through SNAP E&T 50/50 funds for employment, training, and related support services, and coordinate those services with WIOA core programs. • The commonwealth will increase the integration of TANF employment and training services with WIOA core programs. • The commonwealth will design career pathways to have an entry point along the pathway that meets the adult education and workforce program alignment requirements in the "ability to benefit" provision of Title IV of the federal Higher Education Act, to enable eligible participants without a high school diploma to qualify for Pell Grants and other federal student financial assistance.

Other Partner Programs

Department of Labor & Industry: Trade Act; Veterans Programs (Chapter 41 of Title 38); Unemployment Insurance; PennSERVE; Industry Partnerships; Rapid Response Coordination Services; Trade Adjustment Assistance Act Services

Department of Education: Career and Technical Education Programs; K–12 Secondary Education; Office of Commonwealth Libraries

Department of Human Services: Temporary Assistance for Needy Families (TANF) Employment & Training (E&T); Supplemental Nutrition Assistance Program E&T (SNAP); Keystone Education Yields Success (KEYS); PA Work Wear; Juvenile Justice Services

Department of Community and Economic Development: WEDnetPA; Partnerships for Regional Economic Performance; Community Services Block Grant; PA Local Government Training Partnership; Powdered Metals Program

Department of Aging: Senior Community Service Employment Program (SCSEP)

Department of Corrections: Vocational Education; Secondary Education/GED; Adult Basic Education Services; Career Pathways in Reentry Initiative

Pennsylvania Board of Probation and Parole: Returning Citizen Re–entry Programs

Department of Military and Veterans Affairs: Veterans Programs

Department of Agriculture

Pennsylvania State System of Higher Education: 4–year public universities

Pennsylvania Community Colleges: 14 Independent Community Colleges

Pennsylvania Higher Education Assistance Agency: Student Financial Aid Provider; PA–TIP; Loan Forgiveness Program; Federal Teacher Loan Forgiveness Program

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

As described in the Alignment Strategy in Section I of the plan, the commonwealth strives to provide consistently excellent service to workforce development customers across the state through minimum standards, clearly defined roles and responsibilities and well–trained staff.

The commonwealth will establish minimum requirements for PA CareerLink® career services orientation and basic career services customer flow, a customizable initial intake/assessment/triage form, and a customizable template for developing Individual Employment Plans. In addition to ensuring a level of consistency across regions, these minimum requirements and standard forms will also support alignment of services across programs by reducing duplicate data collections and allowing partners to all work from the same basic customer information.

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

The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, local boards are encouraged to secure other services through partner programs and community and faith–based organizations based on local needs. Examples of work with partners to provide necessary supportive services include:

• Participants determined to be eligible under WIOA's Title I core programs are characterized as having barriers to employment. Title I Adult and Dislocated Worker funds allow local areas to provide supportive services while Title I Youth providers offer supportive services based on findings from needs assessmenets. Referrals and/or assistance with transportation, housing, child care and

dependent care are found at all PA CareerLink® centers and can also often be leveraged from TANF and SNAP Employment and Training programs. LWDBs also coordinate with partnering agencies, human services entities, and community–based organizations to ensure a robust variety of services.

• Case management in adult basic education programs connects students with other services, both social services to address barriers to participation in adult basic education programming and services to support transition to employment and/or postsecondary education and training. Perkins postsecondary programs are among the eligible training programs. The programs are part of career pathways aligned to HPOs and credentials.

• OVR partners with local providers to increase resources for extended services for individuals with the most significant disabilities in Supported Employment.

• OVR collaborates with BWPO via PA CareerLink® centers to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment. OVR staff attends PA Cares meetings to learn AT and training programs offered by various community and state agencies and higher education institutions and disseminate this information statewide to OVR Veteran Coordinators and Veteran Counselors who provide AT equipment and training to OVR customers who are veterans with disabilities.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs. The activities described shall conform to the statutory requirements of each program.

The commonwealth is committed to providing high-quality service to employers as evidenced by one of the five state goals being specific to employer engagement. Employers will be prominent participants in the development of workforce development strategies through forums like the employer-led State WDB and through ongoing meetings with business leaders as part of the Governor’s Jobs that Pay Tour.

At the local level, Business Service Teams (BSTs) in the PA CareerLink® centers work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring candidates for on-the-job or customized training where the referred individual is not immediately ready to take on the full duties of the position. BSTs also have access to a plethora of labor market information that can be helpful to employers in setting wages and benefits that will attract high-quality candidates. BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post-secondary providers who can serve as a source of talent for employers.

Employers also have access to the JobGateway® online job-matching portal. The initial system was developed based on feedback from employers received through meetings and surveys. The commonwealth will continuously seek employer feedback in order to enhance JobGateway® functionality and features to better meet employer needs.

The commonwealth welcomes the addition of an employer satisfaction measure to the federal common measures. Measuring employer engagement and satisfaction provides LWDBs with actionable intelligence to identify best practices and weaknesses in serving employers allowing constant system improvement.

Additional efforts to ensure the provision of comprehensive, high-quality service to employers include:

• The OVR Single Point of Contact (SPOC) model, which is designed to help any employer hire and on-board talented individuals with disabilities. The model connects the employer to one individual responsible for coordinating all program supports to include pre-screened talent recruitment and on-boarding supports to ensure new hire success.

• The commonwealth-funded Industry Partnership (IP) program has been successful at enlisting businesses participating in the same general economic sector to collaborate and cooperate. It has been found from the participating firms that IP's encourage continuous improvement while also gaining a better trained workforce through incumbent worker training.

• The Pennsylvania Department of Aging has partnered with the Pennsylvania Homecare Association to improve the skills of current and future workers and consequently improve the home care provided to older individuals. This has been accomplished through the creation of 55 online Direct Care Worker training courses and through a grant to Westmoreland County Community College to train older individuals to become direct care workers.

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

• The PA Department of Agriculture is working with local industry partnerships to identify industry needs and develop relevant training programs to include seeking to establish apprenticeship programs for positions such as Agriculture Equipment Service Technicians and in other occupations, particularly in the dairy industry and organic farming.

• The Work Opportunity Tax Credit program (WOTC) provides tax credits to employers for wages paid to individuals from targeted populations.

• The Strategic Early Warning Network (SEWN), a program managed by the Steel Valley Authority, offers layoff aversion services to manufacturing companies, upon request, at no cost. Core services include financial restructuring, operational restructuring and cost management, ownership transition, high performance workplace strategies and new market opportunities.

• Pennsylvania's Small Business Procurement Initiative designates a portion of state government contracts for companies with 100 or fewer employees that do not exceed established revenue ceilings. Allowing these small businesses to compete for contracts will, in turn, provide opportunities for them to add to their labor force.

• PA CareerLink® helps employers fulfill part of the US DOL requirements for Foreign Labor Certification by helping them recruit U.S. workers and determining whether or not there are any qualified job applicants available to fill their job postings. If U.S. workers are not available Migrant Seasonal Farm Workers are considered.

• Adult basic education programs can provide contextualized basic skills instruction and workforce preparation activities to support incumbent worker training.

• Career and technical education programs provide soft skills instruction, workforce preparation and technical skills instruction to support new worker and incumbent worker needs.

• Utilization of the public library system, which can provide programs and tools, particularly for small business owners and entrepreneurs.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

The commonwealth's workforce development strategy is integrally tied to education, starting with the secondary school system to include career and technical schools and continuing through postsecondary education to include community colleges, and public and private colleges and universities. All core programs have a history of engaging with the education system, in particular the career and technical schools and community colleges, and will continue to develop those relationships.

The core programs will work with the education system to support and develop career pathways identified by employers and the workforce system. The commonwealth is partnering with seven community colleges to develop micro–credentials that demonstrate measurable skill gains and are part of a clearly defined career pathway for individuals with barriers to employment through a Workforce Innovation Fund (WIF) grant. The community colleges are Perkins postsecondary recipients. The model developed by the seven community colleges will serve as a model that can be replicated by all of the Perkins postsecondary recipients. In addition, many of the approved secondary CTE programs of study offer badges to recognize incremental attainment of skills. Badges are earned when a student achieves a minimum score on the technical assessment. A digital badge is an electronic indicator of one's skills, performance, and achievement.

In collaboration with PDE, providers of career and technical education (CTE) programs of study have worked to align industry credentials to high priority occupations. Secondary career and technical centers make appropriate micro–credentials available through end–of–program assessment. Students graduating from a secondary CTE program exit high school with digital skill badges. The digital skill badge is a means to validate individual achievements and verify technical competence through projects, programs and assessments.

There has also been significant collaboration between the commonwealth workforce development system and community colleges on the multiple Trade Adjustment Assistance Community College and Career Training (TAACCCT) grants received. The TAACCCT I grant received by the Community College of Philadelphia and shared among all of the state's fourteen community colleges was used to develop curriculum and customize programs to re–train dislocated workers in the Advanced

Manufacturing, Energy Distribution, Production and Conservation, and Healthcare Technology industries. Career coaches at each college aided students which support included arranging for wrap–around supportive services, as necessary. A TAACCCT II grant was received by Montgomery County Community College to develop prior learning assessment which became the online tool – ccfasttrack.org – used by all community colleges. The college also developed a free online entrepreneurial course – betheboss.org. A TAACCCT III grant was received by Pennsylvania College of Technology, in partnership with Westmoreland County Community College, Navarro Community College (Texas), and Stark State College (Ohio) to support the ShaleNET US consortium. The project provides for entry–level certifications, credit–based stackable credentials, degree programs, and job match system services to job seekers looking to work in the oil and gas industry. Most recently, Northampton Community College, in partnership with Lehigh Carbon Community College and Luzerne County Community College, received a TAACCCT IV grant to prepare dislocated workers and other unemployed individuals for careers in advanced manufacturing, health care, and transportation and logistics building on successful strategies from prior rounds of funding with an emphasis on technology–enhanced learning techniques. The commonwealth will analyze the results of each project and utilize best practices and lessons learned to help improve the broader workforce development system.

Another key area of collaboration and cooperation is the transition from the workforce development program to postsecondary education. Title II case managers, OVR counselors, KEYS student coordinators and WIOA and Wagner–Peyser employment specialists have established relationships with educational staff to support the successful transition of their customers to postsecondary programs. The postsecondary programs include those offered by Perkins postsecondary recipients.

All Pennsylvanians exiting basic education services, both through the traditional K–12 system and through adult basic education, will be prepared to participate successfully in postsecondary level instruction with no need for remediation. To support this vision, Title II adult basic education providers are implementing the College and Career Readiness Standards for Adult Education. At the local level, many adult education providers have developed relationships with postsecondary education providers. Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult basic education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution. The commonwealth will build on best practices developed through these relationships. For example, in the most successful partnerships, both the adult education program and the postsecondary institution have points of contact for referrals. Also, the adult education and postsecondary programs have worked together to identify key content areas for the adult education program to cover to support successful transition to the postsecondary program.

The commonwealth will strive to connect youth and adults seeking postsecondary education with available financial aid to include Pell and PHEAA grant programs. The commonwealth will also encourage those students without a high school diploma or recognized equivalent deemed eligible under ability–to–benefit for financial assistance to enroll in eligible career pathway programs. Contextualized GED programming will also be used as a mechanism for encouraging students without a high school diploma or recognized equivalent to enroll in eligible career pathway programs.

Postsecondary career and technical education is a critical partner in providing integrated basic education and skills training for adults with basic skill deficiencies, and a proven skills–building strategy. Postsecondary career and technical education programs will work with adult basic

education programs to establish integrated education and training programs throughout the commonwealth.

In serving individuals with disabilities, OVR will continue to work collaboratively with local community colleges, career and technical schools and other Perkins recipients to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive, integrated employment in jobs that meet local labor market demand. This will include working to replicate successful programs such as Project PAS and Work Partners to expand postsecondary education options for youth with disabilities. OVR will also work to develop and implement interagency agreements with community colleges and career and technical schools to fill unmet needs within the local workforce delivery system.

In serving veterans, DMVA–OVA will continue to work closely with the Department of Education and student veteran organizations at colleges, universities, trade schools and other institutions of higher learning to create “veteran friendly” learning environments. DMVA will support partners in education with focused outreach and coordination with community partners while supporting veterans and their family members to take full advantage of educational benefits that they have earned. DMVA will leverage these education and training platforms to focus on job skills that meet the needs of employers within the regions. DMVA will coordinate with partners to link employers to these educational institutions and programs to ensure that we graduate skilled applicants who have the greatest potential to move successfully into employment.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State’s Strategies will engage the State’s other education and training providers, including providers on the state’s eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

As prior mentioned in the Strategic section of the plan:

Goal 1.6:The commonwealth will promote and support the creation of pre–apprenticeship and Registered Apprenticeship programs, particularly in non–traditional occupations and for non–traditional populations, as part of relevant career pathway models. The commonwealth will add apprenticeship opportunities to the JobGateway® and Commonwealth Workforce Development Systems (CWDS) and will promote them as job/training options to job seekers.

Goal 1.8: The commonwealth will maintain a robust Eligible Training Provider List (ETPL) to include performance data for all students receiving training in all programs, regardless of the funding source for those students’ training. This will allow for informed customer choice in selecting training programs and training providers. The commonwealth will ensure that there are a sufficient number of training providers serving individuals with barriers to employment on the ETPL.

The commonwealth issued Workforce System Policy No. 04-2015 detailing initial implementation of eligible training provider provisions of WIOA. The policy outlines the requirements for becoming and remaining an eligible training provider in accordance with federal law and regulations. Guidelines may be revised at a later time to ensure that eligible training providers and programs are aligned with career pathways once they are established.

The policy stipulates that all providers and programs eligible under WIA during Program Year 2014 are to remain eligible through June 30, 2016. New providers and programs seeking initial eligibility must, in general: have been in operation at least 12 months; provide program information; assure compliance with nondiscrimination, equal opportunity and ADA; demonstrate effectiveness; and agree to collect and provide performance data. In order to maintain eligibility a provider or program must meet the minimum established performance criteria. Full details regarding initial and continued eligibility requirements can be found in the policy.

Procedures for applying for initial eligibility are as follows:

1. Local workforce development boards solicit training providers in their local area to become an eligible training provider; training providers may independently apply to be an eligible training provider of WIOA title I-B services.

2. Providers seeking eligibility must complete an online application in CWDS.

3. Upon receipt of completed application and required information, the appropriate local workforce development board will review the application and each proposed program.

4. The local workforce development board will make a recommendation for approval or denial to the Department through CWDS; the Department will make the final eligibility determination and add the program(s) to the ETPL if the determination is favorable.

5. Once the Department has approved eligibility, the local board must ensure the provider completes a Memorandum of Understanding covering use of Personally Identifiable Information (PII) in student data, PA wage records, PA employment records, WRIS2, and FEDES, as applicable.

6. New providers will be added to the eligible training provider list as they become eligible. Initial eligibility remains in effect at least one (1) year.

The renewal process for continued eligibility generally follows steps 2 through 6 of the initial eligibility process described above. Training providers seeking to remain on the statewide ETPL must meet at least seven of the ten minimum performance criteria established by the Department.

Registered apprenticeship programs will also be part of the ETPL. Although registered apprenticeship programs are not subject to the same review procedures as other providers, the commonwealth must verify the status of programs to ensure they remain registered and in good standing. Initially, all registered apprenticeship programs in the commonwealth will receive a letter with regard to procedures to opt-in to the ETPL. All registered apprenticeship programs are required to provide the following information to the Department as part of their procedures for inclusion on the statewide eligible training provider list:

• Occupations included within the registered apprenticeship program;

• The name and address of the registered apprenticeship program sponsor;

• The name and address of the related technical instruction provider, and the location of instruction if different from the program sponsor’s address;

• The method and length of instruction; and

• The number of active apprentices.

Registered apprenticeship programs are not subject to the same information reporting requirements as other training programs. However, if Registered Apprenticeship programs volunteer to report performance information, the Department will accommodate such submissions.

The Department will verify the registration status of apprenticeship programs. Once the registration status has been confirmed, the entity will be added to the ETPL and the Department will notify the appropriate LWDB(s). Programs will remain on the list so long as the entity's registration status remains valid or until a program sponsor requests to have a program removed.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

In recent years, there has been significant collaboration between workforce development programs and educational institutions, particularly community colleges. L&I has partnered with a number of Pennsylvania community colleges to apply for federal grants to increase access to post–secondary education for non–traditional, harder to serve individuals. Each of the community colleges is a Perkins postsecondary recipient and each is expected to leverage investments to enhance access to career pathways.

The WIF grant is a partnership between seven LWDBs, seven community colleges, OVR, the PDE Division of Adult Education and DHS, which administers the SNAP E&T and TANF programs. The target population for the project is out–of–school youth, adults with low basic skills and other learners with significant barriers to education and employment. The project aims to establish several career pathway models that include multiple industry–recognized micro–credentials along the pathway. The project will also seek to catalog available interventions and supportive services to assist students in danger of not completing. The ultimate goals of the project are to improve the educational and employment outcomes of students with barriers and to make micro–credentials an integral part of career pathways for individuals.

The commonwealth has also leveraged state workforce development resources to promote new opportunities for students to access post–secondary education. In May 2014, the Access College – Employment Success (ACES) grant was awarded to Dreams Realized through Education Aspiration Model (D.R.E.A.M.) Partnership to create college–based certificate programs for young adults with intellectual disabilities. D.R.E.A.M. Partnership is in the process of developing and implementing programs at two Pennsylvania colleges or universities per year over a three–year period. Programs will provide a mix of credit and non–credit course offerings and extracurricular activities that provide accessible, integrated and developmental opportunities with the goal of increasing participants' opportunities for community–integrated, customized or competitive employment following program completion. The grant is being funded through the state Reemployment Fund.

Additionally, the CECs have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of training programs

based on identified need and demand. The commonwealth will continue to work closely with post–secondary education partners, including all Perkins postsecondary recipients, to leverage federal, state and local resources, including financial aid programs and veterans' benefits, to enhance access to educational opportunities. These efforts are essential in order to meet Governor Wolf's goals for postsecondary credential or certificate attainment.

Lastly, ITAs can be utilized by eligible participants to gain access to and participate in appropriate training programs offered by eligible providers, including education institutions. The ITA may be leveraged with Pell Grants and state financial assistance to increase individual's participation and affordability for training activities.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

As discussed in the Strategic section of this plan, the commonwealth will use data and work with employers to identify the skills and competencies necessary to attain family–sustaining employment and will offer high quality training to individuals to obtain those skills. The commonwealth will also work closely with employers, Industry Partnerships and LWDBs to identify or develop the badges, micro–credentials, certifications and other credentials that adequately represent attainment of those skills.

Governor Wolf has set a goal that 60 percent of Pennsylvanians in the labor force will have postsecondary credentials or certificates by 2025 in order to meet expected employer demand. The commonwealth will work to identify and align credentials to career pathways for high priority occupations. The commonwealth is also exploring the use of micro–credentials, particularly for individuals with barriers to employment, as a means to allow for the attainment of skills in shorter segments and the receipt of an industry–recognized credential to demonstrate skill competency to potential employers. In addition, students enrolled in PDE approved CTE programs are able to earn badges. Badges are earned when a student achieves a minimum score on the technical assessment. A digital badge is an electronic indicator of one's skills, performance, and achievement.

All 14 of Pennsylvania's community colleges use a website and e–portfolio platform called College Credit FastTrack (ccfasttrack.org) to translate prior educational, workforce and life experiences into college credit and to establish common standards for prior learning assessment within the community college sector. The website guides students through developing and submitting a portfolio that highlights their prior learning experiences, including transfer credit, military service, workforce training and badges. A community college faculty then reviews the portfolio and determines how many credits are awarded. Headed by lead institution Montgomery County Community College, College Credit FastTrack was made possible by a $2.5 million Trade Adjustment Assistance Community College and Career Training (TAACCCT) grant from the U.S. Department of Labor.

In accordance with the federal Carl D. Perkins Career and Technical Education Improvement Act of 2006, Pennsylvania requires postsecondary institutions receiving Perkins funding, including the 14 community colleges, to articulate with secondary schools that offer PDE–approved Career and Technical Education (CTE) programs of study. The Students Occupationally and Academically

Ready (SOAR) Program allows qualified students enrolled in an approved career and technical Program of Study to receive college credit toward a diploma, certificate or degree in a similar program at a postsecondary institution. The SOAR program serves as a seamless pathway from secondary to postsecondary education and ensures students transition from level to another without delays or duplication of learning. Colleges use an electronic transfer and articulation system provided by the state to indicate the number of credits awarded to each program of study.

The commonwealth will promote the attainment of postsecondary credentials through a number of programs and initiatives. Examples include:

• All training providers seeking inclusion on the ETPL will be required to describe the credential(s) to be earned. All Perkins postsecondary recipients report on credential, certificate or degree earned as part of their required accountability measures.

• The Industry Partnership program encourages trainings that result in a postsecondary credential by requiring all proposals to identify credentials/certifications to be obtained and making credentials a required outcome measure.

• The PA–TIP program, administered by the Pennsylvania Higher Education Assistance Agency (PHEAA) provides need–based awards to students enrolling in certificate programs less than two years in length for HPOs in a number of industry sectors.

• OVR will continue to analyze labor market demand and model service delivery systems to identify opportunities for industry–recognized certificates that lead to increased and improved employment outcomes for individuals with disabilities.

• The Keystone Education Yields Success (KEYS) program, funded by DHS, provides support and guidance to TANF and SNAP recipients attending any of Pennsylvania's 14 community colleges. A KEYS student facilitator at each college assists eligible students with identifying career goals, scheduling courses, applying for financial aid, transportation and child care needs.

• Education programs, including secondary and postsecondary Perkins and adult basic education, will provide professional development opportunities to help providers understand and navigate the full credentialing spectrum and develop expertise in occupational counseling.

• All postsecondary institutions with Perkins funding have advanced credit offerings aligned with at least one approved CTE program of study and offer additional advanced credit opportunities. Students can earn between two and 22 college credits for their secondary technical coursework, before high school graduation, as permitted in the specific CTE approved program of study and the Perkins IV Statewide Articulation Agreement.

• The CECs will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES.

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies and activities in the State.

Commonwealth economic development strategies are primarily developed and implemented by DCED. DCED staff work closely with local economic and community development entities located throughout the state. To promote coordination and collaboration amongst economic and community development partners, DCED established the Partnerships for Regional Economic Performance (PREP), a network of business assistance partners designed to encourage regional coordination in economic and community development efforts, yielding superior customer service to the business community and a comprehensive, efficient statewide economic delivery strategy. PREP partners are organized in ten regions across the state offering one-on-one counseling, specialized workshops, online training and financial incentives to new business ventures and existing companies looking to expand and grow. The commonwealth has established that the state planning regions under WIOA will be the ten PREP regions to promote and ensure coordination between economic and workforce development at the regional level.

PREP partners use Executive Pulse, a cloud based customer relation management (CRM) software platform, to help manage and coordinate partner outreach with employers. Joining the economic and community development agencies as PREP partners are community colleges, the local PA CareerLink® centers and LWDBs. Additionally a number of LWDBs are considering the use of Executive Pulse to aid in coordinating business engagement between workforce and economic development partners on the regional and state level; the commonwealth encourages this coordination. In 2014 the commonwealth made state funding available through Regional Partnership grants to encourage greater collaboration between LWDBs and PREP partners. Grantees used grant funds in various ways to include comprehensive regional planning, conducting employer needs assessments and developing training programs to meet the needs of regional employers. The commonwealth will also encourage LWDBs to become PREP workforce providers. In order to become a PREP workforce provider, the LWDB must register in the Executive Pulse System. Once registered in the program, the LWDB would be required to use the database in Executive Pulse to share contacts and action items for each business contact.

At a state level, the Secretary of DCED serves as a member of the State WDB, ensuring that workforce development strategies align with economic development efforts. Additionally, the DCED Special Assistant for Agency Development Initiatives is a member of the interagency workgroup previously discussed. In addition to driving state economic development strategies, DCED also administers the Workforce and Economic Development Network of Pennsylvania (WEDnetPA) Guaranteed Free Training Program. The WEDnetPA program provides qualified companies with funding for essential skills and advanced technology training. Since the program's inception, over 1.1 million workers have been trained from 17,733 companies. Business client satisfaction is surveyed annually. In Program Year 14-15, 99 percent of survey respondents reported a positive impact as a result of the training, 80 percent realized improved product and/or service quality, 74 percent saw increased employee morale, 72 percent benefitted from improved communications and teamwork, and 66 percent said the training led to employee promotions and/or increases in pay. In keeping with the commonwealth's goal of making Industry Partnerships and similar multi-employer partnerships the primary means of connecting the workforce development system to the needs of employers, DCED will collaborate with L&I to link WEDnetPA more closely to those partnerships during the coming years.

B. STATE OPERATING SYSTEMS AND POLICIES

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in **Section II Strategic Elements** . This includes—

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

A. STATE OPERATING SYSTEMS THAT SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE-MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

Pennsylvania has in place strong operating systems and policies to support implementation of the Governor's strategic vision. JobGateway® is the commonwealth's job-matching system linking job seekers to employment opportunities and employers to available talent. The system has numerous additional features for job seekers to include skills assessments, career exploration tools and videos, labor market information, interview training and listings of eligible training providers. Similarly, employers have access to recruiting tools and rich labor market information. The Commonwealth Workforce Development System (CWDS) serves as the primary database and system of record for numerous workforce development programs tracking and recording services, activities and outcomes. Activities are recorded by funding stream, enabling the system to identify the resultant outcomes for each investment made. CWDS facilitates dual and multi-program enrollment and service strategies, as customers provide intake information once to register for services while staff triage the individual to the program(s) and funding stream(s) most applicable to the individuals' needs. CWIA uses data collected through CWDS to generate performance reports for programs. While CWDS is the case management system for L&I workforce development programs, there are other workforce and education programs that use different systems of record. The Division of Adult Education uses the e-Data v2 web-based system to collect Title II program data for federal and state reporting purposes. e-Data v2 is a real-time data system with a web-based design that allows users and Division of Adult Education staff access to individual programs' adult education and family literacy data. Division of Adult Education staff and local program staff also use a corresponding Access template to further analyze program data to improve and expand services to participants. For example, reports in the template identify students who have demonstrated measurable skill gain and may be ready for referral to the local PA CareerLink® site for employment or training. This Access template can be expanded to include additional reports that support implementation of the State's strategies to establish career pathways, increase opportunities for out of school youth and adults with basic skills deficiencies, and engage employers. Federal Perkins recipients submit data into the Pennsylvania Information Management System (PIMS). Data is collected at the recipient, program and student level for each of the mandated performance measures. Data reports are provided on an aggregate level. The entities can pull student level reports. PDE works with CWIA on an annual basis to align Perkins programs of study to HPOs. The resulting product is a CIP/SOC crosswalk. Federal Perkins recipients also utilize the data produced by CWIA to connect with regional and local employers. Perkins recipients are required to work with the Local Workforce Development Boards to interpret the data and to apply the data to educational program needs of the region. The LWDB also provides assistance to the Perkins recipients in identifying employers who can partner with the Perkins recipients. The TANF system of record is the Department of Human Services Customer

Information System (CIS). CIS sends referral information to DHS business partners who then utilize CWDS to enroll DHS recipients in contracted Employment and Training programs. The DHS services and related information entered in CWDS are transferred back to CIS via a nightly batch process. Participants may be dual enrolled in a DHS and an L&I program. Duplication of services is avoided due to the integration of the PA CareerLink® centers and DHS EARN centers and by using specific service codes to identify WIOA funded services. Beyond case management systems, the commonwealth has established the PA-WDQI reporting system to link data from multiple data sets. To date, the system includes human services, workforce and wage record data that can be linked in a secure way while protecting confidentiality. The linking of data allows for the measuring of program return on investment and the identification of the supply of skilled workers to meet employer demand. Additional efforts to allow a greater level of integration between CWDS and other data collection and case management systems will also be explored. PDE is working to join the PA-WDQI system and align its longitudinal education data to the data sets in WDQI. PA CareerLink® customers are universally offered Wagner-Peyser, or labor exchange services. Co-enrollment in Wagner-Peyser and WIOA Title I occurs and is encouraged; however the Title I eligibility is assessed and determined at the local level. A Common Measure Program Activity Log has been created within CWDS which tracks periods of participation by program for all US DOL workforce programs. Activities of all programs are tracked in this central location, which allows for the creation of reporting and program participation cycles. Participants who are co-enrolled exit for measurement once 90 days has passed since the provision of services from any program in which they are participating. Relevant state guidance and policies include, but are not limited to: • Guidance for WIOA Title I-B Programs, which aides staff in determining program eligibility and appropriately entering services into CWDS;

• Labor Exchange Policies and Procedures, which discusses CWDS, system use policies, how to enter customer information (both job seeker and employer); how to post jobs; labor exchange services; and other pertinent information;

• Eligible Training Providers Policy, which addresses initial and continued eligibility requirements and processes for the statewide Eligible Training Provider List; and

• e-Data v2 Instruction Manual and Glossary, which provides technical guidance for using the e-Data v2 system.

• PDE's PIMS Secondary and Postsecondary Instruction Manual, which outlines each data element and reporting requirements.

B. DATA-COLLECTION AND REPORTING PROCESSES USED FOR ALL PROGRAMS AND ACTIVITIES, INCLUDING THOSE PRESENT IN ONE-STOP CENTERS*.

The Commonwealth Workforce Development System (CWDS) serves as the primary database and system of record for numerous workforce development programs tracking and recording services, activities and outcomes. Activities are recorded by funding stream, enabling the system to identify the resultant outcomes for each investment made. CWDS facilitates dual and multi-program enrollment and service strategies, as customers provide intake information once to register for services while staff triage the individual to the program(s) and funding stream(s) most applicable to the individuals' needs. CWIA uses data collected through CWDS to generate performance reports for programs. While CWDS is the case management system for L&I workforce development programs, there are other workforce and education programs that use different systems of record. The Division of Adult Education uses the e-Data v2 web-based system collect Title II program data

for federal and state reporting purposes. e-Data v2 is a real-time data system with a web-based design that allows users and Division of Adult Education staff access to individual programs' adult education and family literacy data. Division of Adult Education staff and local program staff also use a corresponding Access template to further analyze program data to improve and expand services to participants. For example, reports in the template identify students who have demonstrated measurable skill gain and may be ready for referral to the local PA CareerLink® site for employment or training. This Access template can be expanded to include additional reports that support implementation of the State's strategies to establish career pathways, increase opportunities for out of school youth and adults with basic skills deficiencies, and engage employers. Federal Perkins recipients submit data into the Pennsylvania Information Management System (PIMS). Data is collected at the recipient, program and student level for each of the mandated performance measures. Data reports are provided on an aggregate level. The entities can pull student level reports. PDE works with CWIA on an annual basis to align Perkins programs of study to HPOs. The resulting product is a CIP/SOC crosswalk. Federal Perkins recipients also utilize the data produced by CWIA to connect with regional and local employers. Perkins recipients are required to work with the Local Workforce Development Boards to interpret the data and to apply the data to educational program needs of the region. The LWDB also provides assistance to the Perkins recipients in identifying employers who can partner with the Perkins recipients. The TANF system of record is the Department of Human Services Customer Information System (CIS). While CIS is the eligibility system of record, TANF Employment and Training vendors also enroll all clients in the CWDS system as part of any program. Clients are encouraged to fully utilize CWDS and JobGateway® as a way of looking for employment. The vendors also use CWDS to update client outcomes. CWDS sends batches of information to CIS so there is no double data entry. Beyond case management systems, the commonwealth has established the PA-WDQI reporting system to link data from multiple data sets. To date, the system includes human services, workforce and wage record data that can be linked in a secure way while protecting confidentiality. The linking of data allows for the measuring of program return on investment and the identification of the supply of skilled workers to meet employer demand. Additional efforts to allow a greater level of integration between CWDS and other data collection and case management systems will also be explored. PDE is working to join the PA-WDQI system and align its longitudinal education data to the data sets in WDQI. The commonwealth often uses Wagner-Peyser as the first step or entry for many participants into the Pennsylvania workforce system. Participants are then often co-enrolled in other WIOA programs based on eligibility and needed services. When individuals exit the system, the commonwealth intends to use "common exit" for as many participants as possible.

* For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (E.G., CO-ENROLLMENT POLICIES AND UNIVERSAL INTAKE PROCESSES WHERE APPROPRIATE). IN ADDITION, DESCRIBE THE STATE'S PROCESS FOR DEVELOPING GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM, INCLUDING BENCHMARKS, AND ITS GUIDANCE TO ASSIST LOCAL BOARDS, CHIEF ELECTED OFFICIALS, AND LOCAL ONE-STOP PARTNERS IN DETERMINING EQUITABLE AND STABLE METHODS OF FUNDING INFRASTRUCTURE IN ACCORDANCE WITH SEC. 121(H)(1)(B). BEGINNING WITH THE STATE PLAN MODIFICATION IN 2018 AND FOR SUBSEQUENT STATE PLANS AND STATE PLAN MODIFICATIONS, THE STATE MUST ALSO INCLUDE SUCH GUIDELINES.

WIOA is designed to help all job seekers access employment, education, training, and supportive services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. Pennsylvania's effective workforce development system (Appendix II) will be built on a foundation of alignment, innovation, employer engagement, accountability structures and improved data. This strong foundation will aid in achieving Governor Wolf's overarching goals of jobs that pay, schools that teach and government that works.

The commonwealth recognizes that it is only through the collective efforts of the various agencies that touch workforce development that optimal outcomes can be achieved. Coordination, communication, leveraging of resources, and partnerships are stressed throughout the Operational Planning section. The commonwealth will develop PowerPoint presentations and training curricula for workforce agency, program and provider staff on the state's new WIOA plan to include the specific roles and opportunities for cross-agency collaboration and how each program can help achieve overall success. One goal of these presentations and curricula will be to diffuse the vision guiding Pennsylvania's new WIOA plan, based on the assumption that shared excitement around a common vision is a critical ingredient for breaking down agency silos. In partnership with the State WDB, the commonwealth will conduct a comprehensive assessment of programs in other states that promote the formal integration of workforce programs (such as those in New Jersey, Texas, Utah, and Wisconsin) and/or deeper interagency cooperation. This assessment will lead to recommendations for Pennsylvania by the end of 2016.

The commonwealth will focus resources on those individuals defined in WIOA to be provided priority of service as well as those individuals with barriers to employment. This will be accomplished through the establishment of minimum spending requirements of Title I training funds on those with barriers to employment, interagency collaboration in serving target populations and seeking of discretionary grant funds that can be used to serve those most in need. State agencies will work together to leverage resources, both federal and other, to achieve the Governor Wolf's Strategic Vision. Best practices in serving target populations will be compiled and shared amongst LWDBs.

The Operational Planning section also includes information about policies, operating systems and procedures, both from a system-wide and program-specific perspective. There is recognition among all partner agencies that policies and procedures need to be better coordinated to ensure program changes in one area do not produce unintended consequences elsewhere. Additionally, efforts will be made to better integrate data systems and case management systems in order to better evaluate programs and better serve system customers.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

The operation of the workforce development system is a shared responsibility among the state, LWDBs, state and local elected officials, the core WIOA partner programs, other partner programs and PA CareerLink® operators. Five of the six core programs are administered by L&I with Adult Basic Education administered by PDE. An overall workforce development system organizational chart, L&I workforce development programs organizational chart and PDE adult basic education organizational chart are included as Appendices I, II and III. Local organizational charts will be required elements of local workforce development plans.

B. STATE BOARD

Provide a description of the State Board, including—

The Pennsylvania Workforce Development Board (PA WDB) is the governor's principal private–sector advisory body for programs and policies under the authority of the WIOA. Implementation of WIOA provisions aligned with Pennsylvania's election of a new governor and provided an additional incentive to restructure and re–establish the PA WDB. Only four members of the previous board were retained, with 43 new persons being appointed. The board exceeds the requirements of WIOA, and includes: the governor; two members of the legislature; two local elected officials; five cabinet secretaries; eight representatives of labor organizations; one representative of a joint apprenticeship and training council; one representative from a community–based organization; two representatives from institutions of higher education; and 25 representatives of business. The Chairman is Mark L. Butler, President and CEO of Ollie's Bargain Outlet, Inc.

1. MEMBERSHIP ROSTER

Provide a membership roster for the State Board, including members' organizational affiliations.

The PA WDB is comprised of a variety of business representatives, small, large, women and minority owned, spanning technology to manufacturing, retail to logistics, healthcare to energy, biotechnology to agriculture, thus creating a diversified board, which enhances the board's ability to look at workforce issues from varying perspectives.

Subcommittees of the PA WDB have included multiple agency representatives including staff from the Office of Elementary and Secondary Education as well as the Office of Postsecondary and Higher Education. The diversity of the representatives ensure secondary, career and technical education and postsecondary policies are addressed in the PA WDB subcommittees.

Pennsylvania Workforce Development Board Roster

Idayat Adewunmi; President, Timi Pharmaceuticals

Joseph J. Alex; President, Alex Color Company

Thomas Beddard; Co–Founder & President, Lady Moon Farms

Georgia Berner; President & CEO, Berner International

Neal Bisno; President, SEIU Healthcare

Senator John Blake; Senate of Pennsylvania

Jeffrey Brown (Vice–Chairman); President & CEO, Brown's Super Stores

Lynette Brown–Sow; VP Marketing & Government Relations, Community College of Philadelphia

Mark Butler (Chairman); President & CEO, Ollie's Bargain Outlets

David Chalson; Sr. VP Operations, Sunoco Logistics

Charlie Crystle; Co–Founder & CEO, The Lancaster Food Co.

Carole De Mayo; Chief HR Officer, First Quality Enterprises

Ted Dallas; Secretary, Department of Human Services

Dennis Davin; Secretary, Department of Community & Economic Development

Terry Dittes; Director, Region 9, United Auto Workers

Patrick Eiding; President, Philadelphia Council AFL–CIO

Brian Funkhouser; President & CEO, Buchart Horn Inc./BASCO Associates

Christopher Hackett; President & CEO, i2M

James Harper, Jr.; Business Mgr., Local 413, Laborers' International Union of North America

Abe Harpster; Co–owner, Evergreen Farms

Wendie DiMatteo–Holsinger; CEO, ASK Foods Inc.

Peter Klein; Director, Steamfitters Local 420, Apprenticeship and Journeymen Training Fund

Ron Kratofil; President & CEO, Goodwill Keystone Area

James Kunz; Business Manager, International Union of Operating Engineers Local 66

Representative Ryan Mackenzie; House of Representatives

Kathy Manderino; Secretary, Department of Labor & Industry

Diane Ellis–Marseglia; Commissioner, Bucks County

Bob McAuliffe; Director, District 10, United Steel Workers

Henry Nicholas; President, National Union of Hospital and Health Care Employees, AFSCME

Michael Pipe; Commissioner, Centre County

Russell Redding; Secretary, Department of Agriculture

Pedro Rivera; Secretary, Department of Education

JoAnne Ryan; President & CEO, Alpha Sintered Metals

Richard Schall; Forest County Wood Products, Inc.

Brian Schaller; Vice President Fuel, Wawa, Inc.

Frank Sirianni; President, PA State Building Trades Council

John “Ski” Sygielski; President, Harrisburg Area Community College

John Thornton; CEO, Astrobotic Technology Inc.

Jessica Trybus; Founder & CEO, Etcetera Edutainment Inc., Simcoach Games

Yvette Watts; CEO, Watts Facility Solutions

Tom Wolf; Governor, Commonwealth of Pennsylvania

2. BOARD ACTIVITIES

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

Members were provided a thorough orientation to their roles and responsibilities as the PA WDB, including Governor Wolf’s strategic vision for the workforce development system in the commonwealth. The governor’s strategic vision calls for the board to assist in guiding the system, specifically through: 1) creating strong policies and standards on local boards and governance; 2) re–designating local workforce areas to more closely align with labor markets while also maximizing resources for direct service delivery; 3) providing direction and building policies surrounding local and regional planning to ensure connection with economic and community development priorities; and, 4) designating grant eligibility for regional efforts.

4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

A. ASSESSMENT OF CORE PROGRAMS

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

The commonwealth will at a minimum produce the six common performance measures described in section 116(b) on a quarterly basis for each of the core programs under Titles I, III, and IV in accordance with the reporting templates proposed under 1205-0NEW. Outcomes will be compared to negotiated levels of performance for each measure. Once Title II data is fully integrated into CWDS, the commonwealth will explore the feasibility of producing these quarterly performance reports for Title II programs. Participant-specific reports that provide the pool of people included in the six common performance measure(s) for Titles I, III, and IV will be compiled in conjunction with these quarterly reports and distributed to LWDBs in support of program management and analysis. Assessment of effectiveness measures are also being developed to allow the state and LWDBs to make more informed decisions about programming and the use of funds. The commonwealth will be developing additional performance measures to the degree they provide meaningful and actionable information and data can feasibly be collected. The state WDB has established a standing committee to review recommendations for Performance and Accountability standards and measures.

The commonwealth will negotiate performance levels for core programs under Title I with LWDBs and local programs based on the state negotiated levels. PDE intends to apply its state negotiated levels for the six common performance measures to Title II programs. In addition, Title II programs will be required to report on the number of outcomes per enrolled student. All core programs will be monitored on a regular basis to ensure progress toward meeting or exceeding state and local WIOA negotiated performance levels.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

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

The commonwealth has submitted a plan of action to further address how one-stop delivery system partner programs will be assessed. The State Plan will be updated once that action plan has been implemented.

C. PREVIOUS ASSESSMENT RESULTS

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of an assessment of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

Pennsylvania is supporting WIOA core programs through effective communication and information sharing among partners. The combined WIOA state plan has already increased the frequency and quality of interactions among partners through shared vision and goals. These groups will continue to meet regularly to share information, discuss programs and collaborate wherever possible to improve outcomes for jobseekers and various programs.

This behavior will be modeled at the state level and shared and replicated within each of the Local Workforce Development Areas, with the intent that they establish similar type of meetings and information exchanges at the local level. The LWDAs will be responsible for adding local partners who can specifically help outcomes for workforce program participants. Effectiveness of core programs, one-stop partners, and combined state plan partners will also be supported through monitoring and evaluation.

State agencies overseeing the various programs and partners regularly review data from services provided at the local level. In addition, on-site monitoring visits are conducted as needed and appropriate. Information gathered from such monitoring is used to determine need for additional guidance and technical assistance for program improvement.

Pennsylvania has met or exceeded its negotiated goals for WIA common measure performance for the past three years, qualifying for incentive grants in PY 2012 and PY 2013. Title II has exceeded its negotiated performance targets annually since 2011–2012. Pennsylvania is in the top two quartiles of performance in the majority of Title II outcome measures.

Under the federal Perkins grant, the Pennsylvania Department of Education provides technical assistance that is focused on improving the effectiveness of the Perkins recipients' delivery of the career and technical education programs. Under the combined plan, the Pennsylvania Department of Education will continue to review and analyze data collected under Perkins and WIOA to determine appropriate technical assistance for each of the recipients. The technical assistance will assist the Perkins recipients to increase effectiveness.

OVR performance standards are established by the Rehabilitation Services Administration. OVR had six main performance indicators, three of which – competitive employment outcomes, significance of disability and earnings ratio – were considered primary indicators. State VR agencies must meet or exceed at least four of the six performance indicators including at least two of the three primary indicators. Pennsylvania OVR has exceeded the performance standards for all three primary indicators and has met or exceeded performance requirements for at least four total indicators in each of the last three years. Pennsylvania OVR has also exceeded the performance ratio level for serving minorities in each of the last three program years.

US DOL assesses the Pennsylvania Department of Aging and nine national sponsors providing SCSEP services in the commonwealth each year against six core SCSEP performance measures. These six measures are: entered employment, retention, average earnings, community service,

service level and most in need. The US DOL establishes goals for each performance measure that its grantees, such as the Department of Aging, must meet or exceed. In both FY 13–14 and FY 14–15, the Department of Aging met or exceeded each performance measure.

Trade Act programs are focused on getting participants reemployed and ensuring those individuals maintain employment. In FY 2013 a total of 3,414 participants received Trade services of which 81.3 percent entered employment and 89.3 percent of those who entered employment retained employment. In FY 2014 a total of 2,887 participants received Trade services of which 100 percent entered employment and 98.2 percent of those who entered employment retained employment. The commonwealth will continue to emphasize and reinforce case management services as a means to maintain performance levels for Trade Act participants. Re–employment services will also be enhanced as a component of case management services for participants who have completed Trade Act training prior to exiting the program. This will ensure that participants are receiving the necessary assistance to enter the workforce with suitable employment in place.

D. EVALUATION

Describe how the state will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

The commonwealth will conduct evaluations and research projects on WIOA core program activities. Such projects will be coordinated and designed in conjunction with the state and local WDBs and the agencies (L&I and PDE) responsible for the administration of the core programs. Projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education.

The commonwealth has submitted a plan of action to further address how the workforce development system and WIOA core programs will be evaluated. The State Plan will be updated once that action plan has been implemented.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

A. FOR TITLE I PROGRAMS

For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

1. YOUTH ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 128(B)(2) OR (B)(3),

Allocation of Youth Funds to Local Areas:

The three-part formula for allocating youth funds to local areas is as follows:

Step 1 The process begins by determining the average number of individuals in the civilian labor force and unemployed for the most recent twelve-month reference period of July 1st through June 30th.

Once these numbers are calculated the areas of substantial unemployment [ASU] are identified. By definition, an ASU is a contiguous area with a population of at least 10,000 individuals and an unemployment rate of at least 6.5 percent.

For Local Areas that have unemployment of 6.5 percent or greater, the civilian labor force and unemployment data is inserted directly into the allocation formula. For Local Areas that have unemployment less than 6.5 percent, an ASU search is performed. For reference, the ASU search process, as described below, is completed through a joint working venture between L&I's Center for Workforce Information and Analysis and the Bureau of Workforce Development Administration.

An ASU search is a procedure developed by the Federal Bureau of Labor Statistics to identify areas of substantial unemployment. County level unemployment data along with either census tract or municipal level unemployment data from the most recent census is used to determine the current unemployment rates for cities, townships, or census tracts. Through this procedure, which can utilize a subtraction or addition method, cities, townships or census tracts that border each other are joined together until the definition of an ASU is achieved. A Local Area can have more than one ASU within their geographic border, if the building method is used.

Once the ASU[s] is designated, the civilian labor force and unemployed totals for each Local Area's ASU are then inserted into the computer based allocation formula.

Step 2 The first third of funds is allocated on the basis of the number of unemployed in areas of substantial unemployment compared to the statewide total of such individuals. The unemployment data was previously determined in step 1. The percentage share of funds is determined by dividing the number of unemployed in each Local Area with unemployment of 6.5 percent or greater, by the statewide total of unemployed in areas with unemployment of 6.5 percent or greater. The resulting percentage is then multiplied by one-third of the State's available allotment. Step 3 The next third of funds is allocated on the basis of the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in each Local Area compared to the total number of such individuals in the State. As required by WIOA the "higher of" either the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the Local Area; or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in the Local Area is calculated.

The excess number of unemployed over 4.5 percent of the civilian labor force is then totaled for the State. This statewide total is then divided into the number of excess unemployed in each Local Area to determine each Local Area's percentage share of funds. This percentage is then multiplied by one-third of the State's available allotment.

Step 4 The final third of funds is allocated based on the number of economically disadvantaged individuals in each Local Area compared to the statewide total of such individuals. The number of economically disadvantaged individuals is derived from the most recent federal census. Economically disadvantaged youth (age 16-21) are used for the youth funding stream.

Using federal census data, the percentage share is determined by dividing the number of economically disadvantaged for each Local Area by the statewide economically disadvantaged total.

The resulting percentage for each Local Area is then multiplied by the final one-third of funds. The amount of funds for each third of the formula is then totaled for each Local Area.

Step 5 Note that prior to the minimum allocation percentage, commonly known as "hold-harmless" provision, being applied, the total amount determined in the prior steps would be each Local Area's allocation. Briefly, the hold-harmless provision ensures that a Local Area will not be allocated funds that are less than 90 percent of their average allocation percentage for the prior two years. Utilization of this authority, combined with WIOA's requirement that a hold-harmless percentage be applied, means that Local Area's allocations will continue to include the critical hold-harmless provision. The utilization of the hold-harmless provision will stabilize Local Area funding and minimize service disruptions.

The next step is then to apply the hold-harmless provision to the allocations. This is done by first combining each Local Area's allocation, excluding transfers or unexpended funds, for the previous two years. The Local Area's two-year combined allocation is then divided by the statewide two-year combined allocation to determine the relative share percentage of funds that each Local Area received for the two reference years.

Ninety percent of the relative share percentage is then calculated to establish the minimum percentage share that each Local Area must receive in the formula allocation process.

Step 6 Using the base allocations determined in steps 2, 3 and 4, each Local Area's percentage share of funds is calculated by dividing each Local Area's allocation amount by the statewide total.

Step 7 This step calculates the minimum dollar amount of funds each Local Area is to receive based on the hold-harmless provision. This is determined by multiplying the 90 percent relative share percentage determined in step 5, by the statewide allotment. The resulting figure establishes the minimum amount of funds that each Local Area will receive under the formula allocation process.

Step 8 Local Areas with a relative share percentage that is less than the 90 percent minimum hold-harmless percentage are identified by comparing the percentage share determined in step 6, to the 90 percent minimum hold-harmless percentage determined in step 5.

The funds needed to bring the Local Areas with percentages below the mandated minimum into compliance comes from the Local Areas who have a percentage share of funds which is above the mandated minimum percentage. Funds are subtracted, on a prorated basis, from the Local Areas that exceed the minimum percentage to bring the other Local Areas that are below the minimum percentage into compliance with the hold-harmless provision.

The Local Area allocations and relative share percentages are then recalculated to determine whether each Local Area received the 90 percent minimum allocation percentage. This step is repeated as many times as is necessary to comply with the minimum allocation percentage provision. Compliance with this provision completes the formula allocation process.

Additionally, Temporary Assistance for Needy Families (TANF) Youth Development Funding (YDF) is allocated to local workforce development areas via the PA Department of Labor & Industry (L&I). L&I currently utilizes TANF caseload numbers (broken down by county), provided each year by the PA Department of Human Services (DHS), to determine the percentage of TANF YDF that will distributed to each local area.

2. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3),

Allocation of Adult Funds to Local Areas:

The three-part formula for allocating adult and youth funds to local areas is as follows:

Step 1 The process begins by determining the average number of individuals in the civilian labor force and unemployed for the most recent twelve-month reference period of July 1st through June 30th.

Once these numbers are calculated the areas of substantial unemployment [ASU] are identified. By definition, an ASU is a contiguous area with a population of at least 10,000 individuals and an unemployment rate of at least 6.5 percent.

For Local Areas that have unemployment of 6.5 percent or greater, the civilian labor force and unemployment data is inserted directly into the allocation formula. For Local Areas that have unemployment less than 6.5 percent, an ASU search is performed. For reference, the ASU search process, as described below, is completed through a joint working venture between L&I's Center for Workforce Information and Analysis and the Bureau of Workforce Development Administration.

An ASU search is a procedure developed by the Federal Bureau of Labor Statistics to identify areas of substantial unemployment. County level unemployment data along with either census tract or municipal level unemployment data from the most recent census is used to determine the current unemployment rates for cities, townships, or census tracts. Through this procedure, which can utilize a subtraction or addition method, cities, townships or census tracts that border each other are joined together until the definition of an ASU is achieved. A Local Area can have more than one ASU within their geographic border, if the building method is used.

Once the ASU[s] is designated, the civilian labor force and unemployed totals for each Local Area's ASU are then inserted into the computer based allocation formula.

Step 2 The first third of funds is allocated on the basis of the number of unemployed in areas of substantial unemployment compared to the statewide total of such individuals. The unemployment data was previously determined in step 1. The percentage share of funds is determined by dividing the number of unemployed in each Local Area with unemployment of 6.5 percent or greater, by the statewide total of unemployed in areas with unemployment of 6.5 percent or greater. The resulting percentage is then multiplied by one-third of the State's available allotment.

Step 3 The next third of funds is allocated on the basis of the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in each Local Area compared to the total number of such individuals in the State. As required by WIOA the "higher of" either the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the Local Area; or the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in the Local Area is calculated.

The excess number of unemployed over 4.5 percent of the civilian labor force is then totaled for the State. This statewide total is then divided into the number of excess unemployed in each Local Area to determine each Local Area's percentage share of funds. This percentage is then multiplied by one-third of the State's available allotment.

Step 4 The final third of funds is allocated based on the number of economically disadvantaged individuals in each Local Area compared to the statewide total of such individuals. The number of economically disadvantaged individuals is derived from the most recent federal census. Economically disadvantaged adults (age 22-72) are used for the Adult funding stream.

Using federal census data, the percentage share is determined by dividing the number of economically disadvantaged for each Local Area by the statewide economically disadvantaged total. The resulting percentage for each Local Area is then multiplied by the final one-third of funds. The amount of funds for each third of the formula is then totaled for each Local Area.

Step 5 Note that prior to the minimum allocation percentage, commonly known as "hold-harmless" provision, being applied, the total amount determined in the prior steps would be each Local Area's allocation. Briefly, the hold-harmless provision ensures that a Local Area will not be allocated funds that are less than 90 percent of their average allocation percentage for the prior two years. Utilization of this authority, combined with WIOA's requirement that a hold-harmless percentage be applied, means that Local Area's allocations will continue to include the critical hold-harmless provision. The utilization of the hold-harmless provision will stabilize Local Area funding and minimize service disruptions.

The next step is then to apply the hold-harmless provision to the allocations. This is done by first combining each Local Area's allocation, excluding transfers or unexpended funds, for the previous two years. The Local Area's two-year combined allocation is then divided by the statewide two-year combined allocation to determine the relative share percentage of funds that each Local Area received for the two reference years.

Ninety percent of the relative share percentage is then calculated to establish the minimum percentage share that each Local Area must receive in the formula allocation process.

Step 6 Using the base allocations determined in steps 2, 3 and 4, each Local Area's percentage share of funds is calculated by dividing each Local Area's allocation amount by the statewide total.

Step 7 This step calculates the minimum dollar amount of funds each Local Area is to receive based on the hold-harmless provision. This is determined by multiplying the 90 percent relative share percentage determined in step 5, by the statewide allotment. The resulting figure establishes the minimum amount of funds that each Local Area will receive under the formula allocation process.

Step 8 Local Areas with a relative share percentage that is less than the 90 percent minimum hold-harmless percentage are identified by comparing the percentage share determined in step 6, to the 90 percent minimum hold-harmless percentage determined in step 5.

The funds needed to bring the Local Areas with percentages below the mandated minimum into compliance comes from the Local Areas who have a percentage share of funds which is above the mandated minimum percentage. Funds are subtracted, on a prorated basis, from the Local Areas that exceed the minimum percentage to bring the other Local Areas that are below the minimum percentage into compliance with the hold-harmless provision.

The Local Area allocations and relative share percentages are then recalculated to determine whether each Local Area received the 90 percent minimum allocation percentage. This step is repeated as many times as is necessary to comply with the minimum allocation percentage provision. Compliance with this provision completes the formula allocation process.

3. DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) AND BASED ON DATA AND WEIGHTS ASSIGNED.

Allocation of Dislocated Worker Funds to Local Areas:

The following factors will be utilized when allocating DW funds to local areas:

• Insured Unemployed (Data Source: Continued Unemployment Compensation Claims): 10 percent

• Unemployment Concentrations (Data Source: Number of Unemployed Over 4.5%): 20 percent

• Plant Closing and Mass Layoff (Data Source: of Workers affected by WARN notices in CWDS): 15 percent

• Declining Industries (Data Source: Employment in Industries Projected to Lose 10% of Employment Between 2012-2022): 10 percent

• Farmer-Rancher Economic Hardship (Data Source: Employment Levels in the Agriculture Industry based upon American Community Survey - US Bureau of Census): 5 percent

• Long-Term Unemployment (Data Source: Number of Claimants Exhausting Unemployment Compensation Benefits): 17 percent

• Dislocated Worker [State added factor] (Data Source: Estimated Number of Dislocated Workers): 23 percent

The data used to calculate the dislocated worker Local Area allocations is provided by the L&I's Center for Workforce Information and Analysis.

County level data for the most recent 12-month program year is entered into the computerized formula.

In order to provide a balanced distribution of funds, one-half of the funds are allocated on a relative share percentage basis and one-half on a proportional basis. Specifically, the insured unemployment, unemployment concentrations, plant closings and mass lay-off and farmer-rancher factors are calculated on a relative share percentage basis. For example, the number of insured unemployed for the Local Area is divided by the statewide number of insured unemployed to determine the relative share percentage for that factor. Conversely, the declining industries, long-term unemployment and dislocated workers factors are calculated on a proportional percentage basis of each Local Area's civilian labor force. For example, the number of dislocated workers for the Local Area is divided by the civilian labor force for that Local Area to determine the percentage of dislocated workers in proportion to that area's civilian labor force.

Using the Local Area data, the computerized formula calculates the Local Area's relative or proportional percentage share for each factor. For the relative factors, the percentage share for each Local Area is first multiplied by the percentage weight assigned to each factor and then by the statewide dislocated worker allocation figure to determine the dollar amount for each relative factor. For the proportional factors, the percentage share for each Local Area is totaled. The resulting

percentage is then divided into each Local Area's proportional percentage share and then multiplied by the percentage weight assigned to each factor and then the statewide allocation to determine the Local Area dollar amount for each factor. The Local Area's allocation amount for each factor is then added together to determine the Local Area's total dislocated worker allocation.

Note that prior to the minimum allocation percentage, commonly known as "hold-harmless" provision, being applied, the total amount determined in the prior steps would be each Local Area's allocation.

Briefly, the hold-harmless provision ensures that a Local Area will not be allocated funds that are less than 90 percent of their average allocation percentage for the prior two years. Utilization of this authority, combined with WIOA's requirement that a hold-harmless percentage be applied, means that Local Area's allocations will continue to include the critical hold-harmless provision. The utilization of the hold-harmless provision will stabilize Local Area funding and minimize service disruptions.

The next step is then to apply the hold-harmless provision to the allocations. This is done by first combining each Local Area's allocation, excluding transfers or unexpended funds, for the previous two years. The Local Area's two-year combined allocation is then divided by the statewide two-year combined allocation to determine the relative share percentage of funds that each Local Area received for the two reference years.

Ninety percent of the relative share percentage is then calculated to establish the minimum percentage share that each Local Area must receive in the formula allocation process.

Using the base allocations, each Local Area's percentage share of funds is calculated by dividing each Local Area's allocation amount by the statewide total. This step calculates the minimum dollar amount of funds each Local Area is to receive based on the hold-harmless provision. This is determined by multiplying the 90 percent relative share percentage by the statewide allotment. The resulting figure establishes the minimum amount of funds that each Local Area will receive under the formula allocation process. Local Areas with a relative share percentage that is less than the 90 percent minimum hold-harmless percentage are identified by comparing the percentage share to the 90 percent minimum hold-harmless percentage previously determined. The funds needed to bring the Local Areas with percentages below the mandated minimum into compliance comes from the Local Areas who have a percentage share of funds which is above the mandated minimum percentage. Funds are subtracted, on a prorated basis, from the Local Areas that exceed the minimum percentage to bring the other Local Areas that are below the minimum percentage into compliance with the hold-harmless provision. The Local Area allocations and relative share percentages are then recalculated to determine whether each Local Area received the 90 percent minimum allocation percentage. This process is repeated as many times as is necessary to comply with the minimum allocation percentage provision. Compliance with this provision completes the formula allocation process.

B. FOR TITLE II:

1. MULTI-YEAR GRANTS OR CONTRACTS

Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

The PDE Division of Adult Education will conduct a competition for multi–year grants for Title II direct service funds as required by WIOA. State adult education direct service funds will be competed through the same process. Grants funds will be awarded through yearly contracts contingent on availability of federal and state funds. Each year's renewal option and grant amounts will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in meeting the state imposed targets for the indicators of performance; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the amount of state and federal awards.

For the competition, PDE will use a needs-based funding formula to allocate funds to the local workforce development areas. This formula was developed in 2010 by PDE and a group of program administrators with technical assistance provided through a national leadership activity. The formula includes five data sets weighted equally: 1) the number of individuals age 18 and over who are not enrolled in school and who do not have a high school diploma; 2) the number of individuals age 16 and over who are in the labor force and are unemployed; 3) the number of individuals age 18 and over with less than a ninth grade education; 4) the number of people below poverty level; and 5) the number of OJT openings per year. In local areas comprised of multiple counties, PDE anticipates further breaking out funding by county to ensure services are available throughout the area.

Grant applications will be submitted through PDE's eGrants system. The content of the grant application will address the seven requirements and thirteen considerations identified in the Act. As part of the application, all eligible providers will be required to submit evidence of demonstrated effectiveness. To demonstrate effectiveness, applicants that have received Title II AEFLA funds and/or state matching funds through PDE Division of Adult Education in the program years immediately preceding the competition will be evaluated based on their performance against the state's negotiated targets during those years. Applicants that did not receive funds through the Division of Adult Education will be required to provide data that show their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills, achieve high school equivalency, and transition into employment and/or postsecondary education/training. Also, as part of the application process, eligible providers will be required to demonstrate alignment of proposed activities and services to the strategies and goals of the local workforce development plan and describe how the activities and services provide learning in context, including through integrated education and training services when and where appropriate. Providers seeking to provide integrated education and training services will be required to supply evidence of their ability to do so either directly or in partnership with other providers. Through a standardized process developed by PDE Division of Adult Education, applicants will submit their grant applications to the local workforce development board for review of alignment with the local plan. Local boards will have the opportunity to provide recommendations to improve alignment.

PDE has guidelines in place to ensure a fair and open competition. In accordance with these guidelines, grant applications will be evaluated by teams of three individuals. Team members will

include staff from the Division of Adult Education, other PDE staff, other qualified commonwealth staff, and, as needed, peer reviewers, subject matter experts, and/or consultants. Division staff will create a scoring rubric for each grant type, which will address all items in the grant application including demonstrated effectiveness and the results of the local board reviews with recommendations. Review team members will be trained prior to beginning evaluation and scoring of applications. Once the applications have been reviewed and scored, they will be ranked from highest to lowest scoring. PDE will award grants to the highest scoring applicant in each of the local workforce development areas and will continue to award funds until the amount allocated to the area under the needs-based formula is reached or until all applications for service in the local area with a sufficient score have been funded.

2. ENSURE DIRECT AND EQUITABLE ACCESS

Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

PDE has policies and procedures in place to ensure that the same grant announcement is made available to all eligible providers. Options for publication of grant announcement(s) include the Pennsylvania Bulletin and Penn*Link. Information will also be posted to the PDE website, which is accessible to the public. PDE anticipates conducting the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for each project being competed.

PDE will use a needs–based funding formula previously developed with input from local administrators to ensure fair distribution of funds to local workforce development areas. Title II distribution of funds is further discussed in the “Program Specific Requirements” section of the State Plan.

C. TITLE IV VOCATIONAL REHABILITATION

In the case of a State that, under section 101(a)(2)(A)(i)of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

PA OVR is a combined agency and consists of the Bureau of Vocational Rehabilitation Services (BVRS) and Bureau of Blindness and Visual Services (BBVS). Funds are distributed based on historical spending patterns of specific regions covered by offices. OVR also maintains a reserve fund in case offices experience an increase in demand for services and funds are redistributed as necessary so that no one single office ever runs out of funds if other offices have remaining funds.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data

systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

1. DESCRIBE THE STATE'S PLANS TO MAKE THE MANAGEMENT INFORMATION SYSTEMS FOR THE CORE PROGRAMS INTEROPERABLE TO MAXIMIZE THE EFFICIENT EXCHANGE OF COMMON DATA ELEMENTS TO SUPPORT ASSESSMENT AND EVALUATION.

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

2. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN.

Five of the core partners utilize CWDS to collect and track participant data. PDE is in the process of working with L&I to connect the Title II data collection system of record (eData v2) with CWDS.

3. EXPLAIN HOW THE STATE BOARD WILL ASSIST THE GOVERNOR IN ALIGNING TECHNOLOGY AND DATA SYSTEMS ACROSS REQUIRED ONE-STOP PARTNER PROGRAMS (INCLUDING DESIGN AND IMPLEMENTATION OF COMMON INTAKE, DATA COLLECTION, ETC.) AND HOW SUCH ALIGNMENT WILL IMPROVE SERVICE DELIVERY TO INDIVIDUALS, INCLUDING UNEMPLOYED INDIVIDUALS.

The Pennsylvania WDB has established a standing committee to consider Performance and Accountability. In considering performance and accountability standards, the committee will contemplate the technology and data systems used to obtain, store and analyze customer information and report performance measures. The WDB will make recommendations to the Governor on ways to improve technology and data systems.

Additionally, the full WDB will engage in a planning retreat featuring a lab session that will allow board members to analyze the comprehensive workforce delivery system from within and from the vantage point of both job seekers and employers. The WDB will use the lab session as a spring board to future initiatives and recommendations to better serve workforce development system customers.

4. DESCRIBE THE STATE'S PLANS TO DEVELOP AND PRODUCE THE REPORTS REQUIRED UNDER SECTION 116, PERFORMANCE ACCOUNTABILITY SYSTEM. (WIOA SECTION 116(D)(2)).

The commonwealth will utilize the WDQI management information system described above to develop and produce the reports required under section 116(b).

Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. Separately, the Departments of Labor and Education anticipate working with States to inform future guidance and possible information collection(s) on these accountability systems. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

WDQI has the potential to longitudinally track workforce development system participants as they enter and complete postsecondary education but the system currently lacks postsecondary education data at an individual level. Discussions have been ongoing to try to bring postsecondary education data into the system while protecting the confidentiality of personally identifiable information. In the interim, programs will continue to track postsecondary program enrollment and completion through manual processes.

C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

The quarterly UI wage records will be merged with participant data from all core partners. The proposed platform for the combined data is the WDQI management information system described above. Access to the quarterly UI wage records for the purpose of program evaluation will be granted within the constraints of Pennsylvania's regulations governing the use of such personally identifiable information.

UI wage records will supplement current labor market information by providing additional insight into the performance metrics. Analyses may include the evaluation of industries that are hiring workforce participants, a comparison of workforce participant wages compared to other workers within an industry, industries that are more apt to hire special population participants and training programs that seem to be the most effective for positive employment outcomes.

D. PRIVACY SAFEGUARDS

Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.

The state follows confidentiality requirements for wage and education records as required by the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and other applicable federal and state laws and regulations.

CWDS is a role-based system with specific permissions granted depending on an individual's role. Confidential information is protected within the system. Access to CWDS by commonwealth employees, as well as by business partners, requires the completion of a CWDS User Agreement and Access Form. The agreement outlines the policy for the disclosure of confidential data and information maintained in CWDS. The form authorizes staff access to an integrated system involving data and information, which is processed, stored, maintained, or transmitted on CWDS for the commonwealth.

The Title II eData v2 system has multiple security levels to access data and has protocols in place to ensure that any sharing of data is compliant with federal and state privacy rules and regulations.

WDQI produces reports of aggregate, de-identified data to ensure that no confidential information, including personally identifiable information, is shared or released.

7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Priority of service is provided in accordance with the commonwealth's Workforce System Policy (WSP) 05-PY2015, Priority of Service—Initial Implementation of the Workforce Innovation and Opportunity Act, December 23, 2015. The priority of service for veterans and eligible spouses applies across all qualified employment and training programs. The priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient is a statutory priority that applies only to the receipt of individualized career services and training services in the WIOA title I Adult program. Local boards may establish a local discretionary priority that also gives priority to other individuals specifically for the receipt of individualized career services and training services in the WIOA title I Adult program. With regard to the priority of service for veterans and eligible spouses, priority of service for the WIOA title I Adult program must be applied in the following order:

1. Veterans and eligible spouses who meet the statutory priority (public assistance recipient, other low-income individuals including the underemployed, or basic skills deficient) and Adult program eligibility must receive the highest level of priority for services;

2. Other individuals (not veterans or eligible spouses) who meet the statutory priority (public assistance recipient, other low-income individuals including underemployed, or basic skills deficient) and Adult program eligibility then receive the second level of priority for services;

3. All other veterans and eligible spouses who meet Adult program eligibility, then receive the third level of priority for services;

4. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority (public assistance recipient, other low-income individuals including underemployed, or basic skills deficient), but do meet a local discretionary priority and Adult program eligibility, then receive the fourth level of priority for services.

5. Other individuals (not veterans or eligible spouses) who do not meet the statutory priority (public assistance recipient, other low-income individuals including underemployed, or basic skills deficient) and do not meet the local discretionary priority, but do meet Adult program eligibility, then receive the fifth level of priority for services.

When a customer appears for PA CareerLink® services, the receptionist determines if the customer is a veteran and eligible for priority of service. If the customer self-discloses veteran status, the receptionist provides the veteran customer with an intake form. This form allows the veteran customer to disclose whether he/she possesses significant barriers to employment, such as: lacks a high school diploma; is a transitional service member; or otherwise qualifies to receive intensive case management services from a DVOP Specialist, if present. Upon determining that a veteran qualifies for intensive case management services from a DVOP Specialist based upon self-disclosed veteran status and the completed intake form, the receptionist immediately refers the veteran to the DVOP Specialist, if available. If the DVOP Specialist cannot see the veteran immediately, the receptionist gives the veteran the choice of making an appointment with the DVOP Specialist or exercising priority of service. If the veteran exercises the latter, the veteran will see the next available PA CareerLink® staff member, i.e., will go to the front of the line for assistance and case management services. If the particular PA CareerLink® office does not have a DVOP Specialist, then priority of service automatically occurs and the veteran will see the next available PA CareerLink® staff member. Upon meeting the veteran for the first time, the DVOP Specialist or PA CareerLink® staff member will ensure that the veteran's CWDS record contains the appropriate veteran service code and that the veteran is otherwise eligible for DVOP Specialist services. Thereafter, the DVOP Specialist will provide the necessary intensive case management services to assist with removing those barriers that inhibit full employment. Priority of service also comes into play with respect to veterans who seek to enter workforce programs such as On-the-Job Training. In these instances, the veteran receives the next available training slot. Additionally, each PA CareerLink® office holds all job orders for twenty-four hours, which allows staff members to first identify qualified veterans. When employers conduct candidate searches, JobGateway® places a United States flag adjacent to a veteran's name.

8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing

staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

The commonwealth's Methods of Administration (MOA) document provides written assurance that the state is in compliance with all nondiscrimination and equal opportunity requirements provided for in federal and state law and regulations. The MOA describes the actions and policies the state takes to ensure compliance. The Office of Equal Opportunity within L&I is responsible for implementing and monitoring compliance with nondiscrimination and equal opportunity provisions of WIOA, ADA and other relevant laws and regulations.

PA CareerLink® centers strive to be physically and programmatically accessible to all customers, including individuals with disabilities. PA CareerLink® centers use principles of universal design and human–centered design, such as flexibility in space usage; the use of pictorial, written, verbal and tactile modes to present information for customers with disabilities or limited English proficiency; providing clear lines of sight to information for seated or standing users; providing necessary accommodations; and providing adequate space for the use of assistive devices or personal assistants. To further support service to individuals with limited English proficiency, many PA CareerLink® centers employ bilingual staff, the PA CareerLink® website utilizes Google translation services to allow the site to be viewed in dozens of languages and the JobGateway® website can be utilized in English or Spanish.

The commonwealth mandates that all PA CareerLink® centers provide reasonable accommodations, reasonable modifications, architectural accessibility, programmatic accessibility, and CWDS website accessibility for persons with disabilities. Each office is equipped with assistive technologies and accessibility features including a computer with common accessibility devices such as JAWS, Zoom Text, enabled sticky keys, modified keyboards and other input devices. Staff members are trained on the maintenance and operation of available assistive technology devices.

In collaboration with one or more Centers for Independent Living and the Office of Deaf and Hard of Hearing, the commonwealth will evaluate the physical accessibility and information technology accessibility of all PA CareerLink® offices and services to ensure that Pennsylvanians with a disability are able to fully avail themselves of PA CareerLink® services.

L&I's Office of Equal Opportunity evaluates each PA CareerLink® office at least every three (3) years to ensure compliance with ADA standards. This is done as part of the PA CareerLink® certification process. The commonwealth's Workforce Delivery System Policy outlines all of the criteria for certification and re–certification of its PA CareerLink® offices.

PA CareerLink® staff members receive refresher training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. Each office is required to develop an Enhancement Plan for providing services to persons with disabilities.

CWDS offers a variety of resources and information on services available to persons with disabilities including: information on training opportunities and links to online training; technology guides for using screen enlargement software, screen reading software, Windows Accessibility features, and the Text Telephone or Teletypewriter for the Deaf (TTY); information on the ADA and accessibility; alternate format handbooks; links to service providers and resources to assist persons with disabilities in removing barriers to employment; and links to information for employers interested in hiring a person with a disability including tax benefits, the ADA and accommodations.

The Division of Adult Education requires all Title II programs to be ADA compliant and mandates that programs have reasonable materials available for students to use to accommodate learning differences. The Division of Adult Education also supports various professional development activities on providing services to address learning differences.

In order to further promote programmatic accessibility, OVR has developed a comprehensive disability awareness and etiquette training that is delivered across the commonwealth to interested PA CareerLink® partners and businesses. OVR has also made available to all commonwealth employees an “Introduction to OVR” training to inform staff about the services OVR can offer to individuals with disabilities. OVR staff has received Leadership Training on the Americans with Disabilities Amendments Act (ADAA) to include strategies and modules for training businesses and customers on the Act.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

PA CareerLink® centers use principles of universal design and human-centered design, such as flexibility in space usage; the use of pictorial, written, verbal and tactile modes to present information for customers with disabilities or limited English proficiency; providing clear lines of sight to information for seated or standing users; providing necessary accommodations; and providing adequate space for the use of assistive devices or personal assistants. To further support service to individuals with limited English proficiency, many PA CareerLink® centers employ bilingual staff, the PA CareerLink® website utilizes Google translation services to allow the site to be viewed in dozens of languages and the JobGateway® website can be utilized in English or Spanish.

IV. COORDINATION WITH STATE PLAN PROGRAMS

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

Representatives from each of the core programs and partner programs assisted in writing the Combined State Plan. Additionally, a team of individuals representing each of the core and partner programs met regularly during the drafting of the Plan to allow appropriate input and guidance from all partners. All partners were given the opportunity to review and comment on the draft Plan prior to it being posted for public comment to ensure the Plan met the needs of the populations served by each program. Representatives from each partner program had the opportunity to review and respond to public comment received and to provide input on changes from the version of the plan posted for public comment to the plan finally submitted.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts; Yes

2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes; Yes

3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes

4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes

5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes

6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes

7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes

8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B--

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

A. IDENTIFY THE REGIONS AND THE LOCAL WORKFORCE DEVELOPMENT AREAS DESIGNATED IN THE STATE.

Designated Planning Regions

• Central Planning Region – – consisting of Centre, Clinton, Columbia, Lycoming, Juniata, Mifflin Montour, Northumberland, Snyder and Union Counties

• Lehigh Valley Planning Region – consisting of Lehigh and Northampton Counties

• North Central Planning Region – consisting of Cameron, Clearfield, Elk, Jefferson, McKean and Potter Counties

• Northeast Planning Region – consisting of Carbon, Lackawanna, Luzerne, Monroe, Pike, Schuylkill and Wayne Counties

• Northern Tier Planning Region – consisting of Bradford, Susquehanna, Sullivan, Tioga and Wyoming Counties

• Northwest Planning Region – consisting of Clarion, Crawford, Erie, Forest, Lawrence, Mercer, Venango, and Warren Counties

• South Central Planning Region – consisting of Adams, Cumberland, Dauphin, Franklin, Lancaster, Lebanon, Perry and York Counties

• Southeast Planning Region – consisting of Berks, Bucks, Chester, Delaware, Montgomery and Philadelphia Counties

• Southern Alleghenies Planning Region – consisting of Bedford, Blair, Cambria, Fulton, Huntingdon and Somerset Counties

• Southwest Planning Region – consisting of Allegheny, Armstrong, Beaver, Butler, Greene, Fayette, Indiana, Washington and Westmoreland Counties

Local Workforce Development Areas

1. Allegheny County Workforce Development Area

2. Berks County Workforce Development Area

3. Bucks County Workforce Development Area

4. Central Workforce Development Area – consisting of Centre, Clinton, Columbia, Lycoming, Mifflin, Montour, Northumberland, Snyder and Union Counties

5. Chester County Workforce Development Area

6. Delaware County Workforce Development Area

7. Lackawanna County Workforce Development Area

8. Lancaster County Workforce Development Area

9. Lehigh Valley Workforce Development Area – consisting of Lehigh and Northampton Counties

10. Luzerne–Schuylkill Counties Workforce Development Area – consisting of Luzerne and Schuylkill Counties

11. Montgomery County Workforce Development Area

12. North Central Workforce Development Area – consisting of Cameron, Clearfield, Elk, Jefferson, McKean and Potter Counties

13. Northern Tier Workforce Development Area – consisting of Bradford, Susquehanna, Sullivan, Tioga and Wyoming Counties

14. Northwest Workforce Development Area – consisting of Clarion, Crawford, Erie, Forest, Venango and Warren Counties

15. Philadelphia Workforce Development Area

16. Pocono Counties Workforce Development Area – consisting of Carbon, Monroe, Pike and Wayne Counties

17. South Central Workforce Development Area – consisting of Adams, Cumberland, Dauphin, Franklin, Juniata, Lebanon, Perry and York Counties

18. Southern Alleghenies Workforce Development Area – consisting of Bedford, Blair, Cambria, Fulton, Huntingdon and Somerset Counties

19. Southwest Corner Workforce Development Area – consisting of Beaver, Greene and Washington Counties

20. The City of Pittsburgh Workforce Development Area

21. Tri–County Workforce Development Area – consisting of Armstrong, Butler and Indiana Counties

22. West Central Workforce Development Area – consisting of Lawrence and Mercer Counties

23. Westmoreland–Fayette Workforce Development Area – consisting of Fayette and Westmoreland Counties

B. DESCRIBE THE PROCESS USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR "PERFORMED SUCCESSFULLY" AND "SUSTAINED FISCAL INTEGRITY" IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS.

Pennsylvania issued a revised Workforce System Guidance No. 02–2014 on June 30, 2015, providing initial designation to Pennsylvania's 23 local workforce investment areas that existed under WIA effective July 1, 2015 through June 30, 2017. The guidance requires Chief Elected Officials, in collaboration with local workforce development boards and other workforce system stakeholders, to evaluate their local areas on a series of factors to include: natural labor market areas; regional economic development areas; existence of education and training providers, such as institutions of higher education and career and technical education schools; service delivery and resources available toward the provision of services; benefits of multiple resources within areas that are based on labor markets and natural travel patterns of local residents; capacity and access to public/private transportation resources; education leaders, business leaders, government officials, stakeholder buy–in; availability of Federal and non–federal resources necessary to effectively administer workforce investment activities and other provisions of the WIOA to include resources beyond the 10 percent allowed for administrative expenditures allotted to local areas; strategies to provide enhanced quality services to employers and individuals; and local capacity to manage funds, provide oversight of programs, and provide for the proper stewardship of public funds.

The Chief Elected Officials and local workforce development board chair must submit a formal letter to the Department by March 1, 2016 describing the evaluation process and addressing each of the factors above. The review is intended to serve as the basis for a local workforce development area either seeking continued designation in its current form or seeking designation as part of a newly proposed workforce development area. A newly proposed workforce development area must include more than one unit of local government. A request for new area designation must address the factors listed above and the impact on the workforce development area from which it is withdrawing (if applicable). The request must be signed by all of the Chief Elected Officials who make up the new local workforce development area. Final approval of newly requested workforce development areas rests with the governor. The governor reserves the right to make additional changes in regard to local area designation.

The local area is determined to have performed successfully if it has met or exceeded locally negotiated levels of performance and has not failed any individual measure for the last two consecutive program years before the enactment of WIOA for initial designation and in the first two years of enactment for subsequent designation. The terms "met or exceeded" and "failed" are defined as consistent with how those terms were defined at the time the performance levels were negotiated.

The local area is determined to have sustained fiscal integrity if, within the last 2 consecutive years preceding the determination of fiscal integrity, a formal determination has not been made that either the grant recipient or administrative entity of the local area misexpended funds due to willful disregard of the requirements of the provisions involved, gross negligence, or failure to comply with accepted standards of administration.

In accordance with WIOA, the commonwealth has established ten regional planning areas. The ten regions mirror the existing Partnership for Regional Economic Performance (PREP) regions used by the Department of Community and Economic Development to promote collaboration among economic development partners. Prior to WIOA, the commonwealth began to encourage the inclusion of workforce development partners in PREP region strategic planning through the issuance of Regional Partnership grants. The goal of the grants was to strengthen workforce and economic development collaboration at a regional level to develop a highly skilled workforce to support business growth and attraction. Using the PREP regions as the commonwealth's regional planning areas logically follows the aims of WIOA to increase partnerships with economic development. Regional plans will look at how workforce development, economic development, education and other partners interact at a macro–level to serve the citizens and employers of the region.

While the PREP regions will be the defined regions for purposes of WIOA, the commonwealth strongly supports and encourages additional regional planning for specific purposes to include alternate contiguous in–state regions, non–contiguous regions and multi–state regions. Additional regional planning could be done in support of sector strategies, grant applications, economic development initiatives or other initiatives that arise.

Each local workforce development board and its chief elected official(s) must collaborate with the other local workforce boards and chief elected officials within its planning region to prepare and submit a transitional one–year regional plan for PY 2016. Additionally, a transitional one–year PY 2016 local plan for each local workforce development board within a workforce planning region must be developed by the local boards and their respective chief elected official(s), in alignment with the transitional regional plan, and submitted as a component of that regional plan. Transitional regional plan and local plan templates have been issued by the commonwealth in Workforce System Guidance No. 05–2015: Regional and Local Planning.

C. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS.

The commonwealth maintained local area designations, so an appeals process has not yet been established; however, an appeal process will be provided for through policy should the commonwealth re–designate local areas.

D. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS FOR INFRASTRUCTURE FUNDING.

In cases where local areas cannot agree to infrastructure funding and the state formula is used, an appeals process will be outlined in the commonwealth's Financial Management policy.

2. STATEWIDE ACTIVITIES

A. PROVIDE STATE POLICIES OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES.

Pennsylvania issued Workforce Investment Information Notices (WIINs) and workforce policies that provided guidance for the workforce system from the time the Workforce Investment Act of 1998 (WIA) was enacted up until the time it was rescinded. Such notices and policies administered direction to the commonwealth's 22 local boards as well as other statewide and local workforce system stakeholders. Upon the enactment of WIOA, the commonwealth established seven workgroups composed of various stakeholders throughout the commonwealth to provide recommendations to L&I and inform key elements of the state plan, as well as future policies and guidance. Pending fully complete federal guidance, the commonwealth has had an obligation to issue interim guidance in order to maintain federal compliance, which may change as a result of additional guidance from the federal government. That guidance includes, but is not limited to:

• Workforce System Policy No. 02–2014, V002: Workforce Delivery System, Version 002

• Workforce System Policy No. 01–PY2015: Pennsylvania's Workforce System of Record

• Workforce System Policy No. 02–PY2015: Local Governance Policy

• Workforce System Policy No. 03–PY2015: Financial Management Policy

• Workforce System Policy No. 04–PY2015: Eligible Training Providers

• Workforce System Policy No. 05–PY2015: Priority of Service

• Workforce System Policy No. 06-PY2015: Training Expenditure Targets and Definitions of Training for Benchmarks

• Workforce System Policy No. 07-PY2015: Oversight

• Workforce System Guidance 02–2014: Process and Timeline for Designation of Pennsylvania's Local Workforce Development Areas

• Workforce System Guidance No. 01–PY2015: Implementation of the Workforce Innovation and Opportunity Act — Transition Procedures

• Workforce System Guidance No. 03-PY2015: Youth Eligibility Definitions

• Workforce System Guidance No. 04-PY2015: Self-Certification and Telephone/Document Verification

• Workforce System Guidance No. 05–PY2015: Regional and Local Planning

• Workforce System Guidance No. 06-PY2015: Incumbent Worker Training Activities

The Department did not develop a policy with regard to the 2015 version of the Trade Act but does follow USDOL Training Employment Guidance Letter (TEGL) No. 5-15, dated September 4, 2015.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS

Governor's Set–Aside Funding Governor's set–aside funds will generally be used to promote Governor Wolf's vision of jobs that pay, schools that teach and government that works with more specific emphasis on the five goals for the workforce development system articulated in the strategic portion of the State Plan.

The commonwealth plans to use a portion of Governor's set–aside funds to support the creation of an Apprenticeship and Training Office (ATO) with the goal of promoting and growing Registered Apprenticeship (RA) and pre–apprenticeship programs across the state. The ATO is described in greater detail in the response to how the state will incorporate RA into its strategies and services.

The commonwealth also plans to use set–aside funds to expand and provide additional support for the Industry Partnership program as well as similar multi–employer partnerships that conduct workforce development activities that are within the scope of WIOA.

Additionally, the commonwealth intends to use set–aside funds to provide discretionary grants to LWDBs to support programs and activities that better serve targeted groups of workforce development system customers.

The commonwealth also plans to use set–aside funds to identify and replicate proven models for high–risk out–of–school youth, including models that incorporate demand–driven strategies and multi–employer workforce partnerships such as Industry Partnerships.

Lastly, a portion of set–aside funds will be used to provide incentives to LWDAs whose performance exceeds negotiated levels and meets the criteria in state policy.

Rapid Response Services

Rapid response is an early–intervention service that helps workers and employers affected by layoffs, plant closures, or natural disasters. It provides information about and access to the commonwealth's PA CareerLink® and unemployment compensation systems, helping to transition workers into reemployment.

The primary objective of rapid response is to provide workers with the resources and services necessary to allow them to find new jobs or get the training and education needed for new careers so they can return to work quickly.

Rapid Response Services (RRS) also helps communities develop proactive and coordinated strategies to access Pennsylvania's economic development systems that help businesses at risk of closing to keep their doors open.

L&I's Deputy Secretary for Workforce Development is responsible for executive oversight of Pennsylvania's RRS activity under WIOA. The Rapid Response/Trade Coordination Services Unit within the Bureau of Workforce Partnership & Operations is responsible for the policy development and implementation of the state's rapid response program.

The commonwealth uses a regional approach to deliver rapid response assistance. There are L&I regional bureau staff assigned to geographic areas covering one or more LWDAs. Regional representatives work closely with PA CareerLink® staff as well as the local board or chief elected officials, as appropriate. They meet with the LWDB staff periodically to share information and to discuss major dislocation events. RRS provides information and access to a comprehensive menu of available services and resources to avert or reduce the effect of plant closings and mass layoffs to businesses, communities and individuals.

Early intervention services provided through RRS offer workers affected by downsizing the best chance to reenter the workforce as quickly as possible. Since inception, RRS has become nationally recognized, often cited by the U.S. Department of Labor as a model for service delivery.

RRS, in concert with partners operating as a single business services team (BST) provides strategic planning that helps area employers become more globally competitive and connect with area economic development and educational institutions to meet their workforce needs. RRS is the state's lead unit delivering a business–focused approach, working with employers to coordinate layoff aversion activities in coordination with the Strategic Early Warning Network (SEWN) and other economic development stakeholders working with the affected employer and supply chain companies, as applicable.

L&I, through a competitive process, contracted with the Steel Valley Authority to design and manage SEWN, which provides layoff aversion services to help businesses, particularly in the manufacturing sector, remain competitive and keep workers employed. SEWN and RRS obtain referrals to struggling companies through a variety of sources, including workforce development professionals, LWDBs, financial institutions, company customers, suppliers or vendors, industrial resources centers, unions, or affected workers themselves. Within 48 hours of receiving a referral, SEWN staff and/or RRS will contact the company and attempt to establish a meeting and plant tour. SEWN staff has expertise in several areas of business turnaround and layoff aversion, including: financial restructuring; buyouts; succession planning and ownership transition; labor–management relations; high–performance workplace strategies; operations; and cost management.

Informational and Direct Reemployment Services for Workers

Rapid response activities are triggered when L&I learns of a planned closure or layoff, either by receiving a notice under the Federal Worker Adjustment and Retraining Notification (WARN) Act, through the media, or by information provided by community and business leaders. Services may also be offered when Pennsylvania experiences mass job dislocation as the result of a natural disaster. There is no charge to the employer or employee for these services, and they are provided regardless of the reason for the layoff or closing.

RRS initiates a fact finding meeting to plan for coordination of services within 48 hours of receipt of notice. Contact is made with the employer and any union to develop a preliminary service strategy. Through rapid response, orientation meetings are held either at the workplace or at a convenient site to provide workers with a wide range of information about benefits and services that are critical for a successful transition to new employment or training for a high–priority occupation, based on

assessment of their skills and background. When possible, orientation meetings are held prior to the layoff date and on company time. Information is typically provided on the following topics: unemployment insurance; transition teams; outplacement services; health and pension benefits; job–search activities; education services; training programs; Trade Adjustment Assistance; social services programs; community and economic development activities; emergency assistance; and crisis counseling.

Working in close partnership with CWIA, along with PA CareerLink® and LWDBs, RRS developed an outplacement curriculum delivered to affected workers that uses comprehensive, customizable workshops and a proven “Surviving a Layoff” publication. The customized workshops include information about the realities of job loss, job–search strategies, local labor market information (LMI), using social media as a job–search and networking tool, resume development, job–search resources, household budgeting and job–interviewing tips.

Crucial to the program’s success is the ability of RRS to gather and synthesize real–time LMI and conduct needs–profiling of dislocated workers accomplished through surveys distributed, completed, and collected at RRS informational sessions with affected employees. By understanding the local, regional, and in some cases statewide cause and effect related to a dislocation event, along with the manner in which these circumstances directly affect individual workers, RRS has become an essential component in the commonwealth’s layoff–aversion and reemployment network.

RRS realizes its full potential for employers when it is managed as a business service during the entire business lifecycle. The commonwealth will continue to invest rapid response dollars to fund a layoff–aversion system targeting small– and medium–sized manufacturing firms. RRS staff sits on local PA CareerLink® and regional economic development BSTs to help employers with turnaround and to market dislocated workers to employers, enhancing the value of business services provided by the workforce and economic development systems. RRS, as well as the regional SEWN representatives, will also receive technical training to allow them to effectively market the Shared–Work Program operated by the Office of Unemployment Compensation Benefits & Services as a component of layoff–aversion strategy.

RRS staff will maintain a comprehensive set of partnerships to provide customers the services, resources, and benefits they are eligible for and need. To complement the current network of partnerships, RRS will continue outreach efforts to other entities such as local chapters of the Society for Human Resource Management, manufacturing associations, state and local economic development entities, chambers of commerce, industry partnerships and sector–based associations and business groups, central labor councils and area labor federations increasing awareness of rapid response services as a business–cycle service linking workforce and economic development.

Rapid Response Additional Assistance, or RRAA, funding will be directed to serve LWDAs when local funding balances are insufficient to ensure a continuum of services for dislocated workers. Funds may be provided to LWDAs that experience increased numbers of unemployed individuals due to natural disasters, plant closings, mass layoffs, or other events for provision of direct services to participants.

Through the fact-finding process, Rapid Response staff are able to gather information from the employer related to the layoff/closure. At times, the information shared by the employer reveals that the loss of business is due to foreign imports/exports. When such information is shared, the RR staff informs the employer, employees, and union (if applicable) to apply for Trade Act benefits. RR will work with any entity (employer, union, workers) willing to file a Trade petition with the USDOL. RR

provides the technical assistance to complete the Trade petition application and file it with the USDOL accordingly.

The fact-finding information gathered is shared with all partners in the LWDA to ensure that planning for such dislocation occurs in a timely manner. It also provides the opportunity for RR to recommend to the LWDAs to request additional RR funds to ensure that services can be provided for the dislocated workers (DW). When a company has applied for Trade benefits, the additional RR funds can be used to provide “on-site” DW services prior to the company closure. RR and LWDA staff develop a comprehensive plan with the company and union, if applicable, to provide workers with services such as JobGateway® registration and access to various workshops related to topics such as healthcare, retirement, training opportunities in the workforce area, and soft skills to re-enter the workforce.

Funds can also be provided to develop customized pre-employment/training services. Local partnerships with community colleges and organizations will help with development and planning of basic computer skills training and pre-GED/basic skills workshops. Having these services planned out in advance enables the DW to obtain or refresh skills that are needed for the current job market. It may also serve as a platform for more in depth training.

The additional funds will also be used to re-enforce the partnerships established with local employers in the respective workforce area. The RR staff, with the collaboration of LWDA partners, can opt to arrange various job-fairs for the Trade affected dislocated workers. Companies in the workforce area may benefit in filling current open positions and/or take the opportunity to engage in on-the-job-training for workers with transferable skills.

Ultimately, RRS have substantial benefits for the impacted employees, employers and community at large.

RRS helps dislocated workers turn the challenge of a layoff into an opportunity by providing information about, and access to, the following services:

• Unemployment compensation;

• Career counseling, resume preparation and job–search assistance;

• Education and training opportunities, including Trade Adjustment Assistance;

• Locally available supportive services;

• Referrals and information about English as a second language or Limited English Proficiency classes;

• Referrals and information about Adult Basic Education and GED classes;

• Referrals and information about services available through the Office of Vocational Rehabilitation;

• Dislocated worker transition teams;

• Surviving a layoff, resume preparation, and interviewing skills workshops;

• Information about the local labor market;

• Information about retirement–plan benefits, Social Security and health–insurance options.

• Services exclusively for veterans and adults with disabilities.

When employers contact RRS, they can expect:

• A quick response to transition planning needs;

• Confidentiality concerning business decisions;

• Help throughout their entire business cycle;

• Help understanding government regulations;

• Information about alternatives that may reduce or avoid layoffs;

• For small– to medium–sized businesses, referral to agencies that can help in re–structuring to avoid layoffs or closing the business;

• Higher productivity and worker morale and lower absenteeism during the layoff event due to reduced stress.

Lastly, community involvement forms the basis for some of the most dynamic and effective transition services available. The benefits of rapid response to the community include:

• Working with elected officials at the state and local levels;

• Helping to save the local tax base by keeping workers employed;

• Lessening adverse economic effects on other businesses within the community;

• Responding to job and business loss when a natural disaster occurs;

• Coordinating available resources by tapping into the community's service providers;

• Reducing emotional and financial stress on the community by offering workshops for unemployed workers, and local affected supply–chain or vendor companies; and

• Coordinating support groups and transition teams for unemployed workers.

C. IN ADDITION, DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

The L&I Rapid Response Unit works as the initial point of contact for businesses, emergency management teams to assist the businesses, and dislocated workers that are affected by a natural

disaster. The Rapid Response Unit works in conjunction with Federal, State and Local Emergency Coordinators to respond to affected businesses. Regional Rapid Response Coordinators work with their regional and local emergency teams to develop contingency plans. Rapid Response works with the business through the business downturn cycle whether or not the disaster is PEMA or FEMA designated. If the disaster has an immediate impact on local business operations, Rapid Response coordinates the efforts with their local teams including Unemployment Compensation, local workforce development and economic development entities, and other stakeholders to develop a strategic plan to assist the affected business and dislocated workers.

Rapid Response Coordinators work with LWDBs, fiscal agents and operators to assure delivery of services and assist in the application for additional workforce funds when necessary. WIOA permits states to provide Rapid Response Additional Assistance funds to local areas with an increased number of unemployed individuals, due to natural disasters, plant closings, mass layoffs or other events, if there are not adequate local funds to assist the dislocated workers.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

L&I placed Trade Act Services, which administers the Trade Adjustment Assistance (TAA) program and RRCS within the Bureau of Workforce Partnership and Operations to align early intervention with TAA program administration. RRS markets TAA to companies, workers, and unions (where present) through the rapid response process. Within 48 hours of receiving a WARN notice (or any other form of Public Notice) from a company that is either closing or laying-off, a RR representative contacts the employer and initiates a fact-finding session (in person/by-phone). Information is gathered on the following items:

• Reason for closure/layoff

• Size of the workforce

• Demographics of the workforce

• Supply chain

• Timeframe in which closure/layoff will take place.

Following the gathering of information, the RR representative provides a summary of workforce services that will benefit the affected workers such as on-site workshops covering resume writing, job search skills, interviewing techniques, managing a household budget and Unemployment

Compensation. These pre-layoff workshops serve as a precursor for the workers in preparing for the upcoming layoff. Further, the RR representative explains the benefits of having the company apply for Trade benefits on behalf of their workforce. The RR representative reviews the benefits that the Trade Act offers to workers, emphasizing the training opportunities available for a higher skilled workforce in the respective area. The RR representative is able to assist the employer complete a Trade petition application on site and encourages sending the completed application via the US DOL website (https://doleta.gov/tradeact/). Finally, the employer is left with an informational folder providing a summary of what has been reviewed during the fact-finding meeting and schedules a follow-up meeting for next steps.

With the information gathered during the fact finding meeting, the RR representative assembles a Rapid Response Team that can meet the needs of the workers in a particular dislocation. The demographic information gathered at the fact-finding allows for Rapid Response to focus in on particular needs of the workers. This includes, but not limited to:

• Limited English Proficiency (LEP)

• Workers near Retirement Age

• Workers lacking a High School Diploma

• Workers with limited or no post-secondary education

• Transportation barriers

The RR representative encourages the local Workforce Development Board to request additional Rapid Response funds to ensure that enough funds for supportive services are available to serve the workers in question, specifically in areas that are identified as barriers to employment.

A Rapid Response Team will include specialists that will cover:

• Unemployment Insurance

• Health and Pension Benefits

• Job Search Activities

• Education Services

• Trade Adjustment Assistance

• Social Service Programs

• Community and Economic Development

• Other members deemed necessary to serve a specific dislocation

The Rapid Response representative follows up with employer to schedule pre-layoff workshops as well as a Rapid Response Information Session (RRIS) with the affected workers. Various dates can

be scheduled to accommodate large dislocations. The Rapid Response representative makes it a priority to involve the employer and worker union (if applicable) in the planning of the RRIS to cover subjects such as, but not limited to, location of the event, amount of invitees, and information that will be presented. The RRIS is usually scheduled four to six weeks prior to layoff/closure date. The RR representative will also follow up with the employer to check the status of the Trade petition application. If the employer has not moved ahead with the application, the RR representative will encourage the union (if applicable) and/or workers to submit a Trade petition application. In situations where three workers are unable to come together to complete a Trade petition application, the State Agency will submit it on the workers behalf.

The Rapid Response representative meets with the assembled RR Team to provide an overview of how the event will unfold to include order of presenters and general flow of the event. A strong emphasis is given to providing the participant with up to date information on UC, health benefits and workforce services. Workers are given an overview of what their local PA CareerLink® has to offer to include training, one-on-one job search assistance, career assessment and case management services built on an Individual Employment Plan tailored to the worker needs. PA CareerLink® staff is present at the RRIS to schedule one-on-one appointments with workers who want to access workforce benefits. Each worker present at the RRIS completes a survey that gathers critical information for ongoing follow-up services (contact information, education background, work history, skills, interest in training/job search, etc.) These surveys are reviewed by Rapid Response staff and shared with local PA CareerLink® case managers who will provide follow-up services to these workers. The surveys provide a solid foundation for the case managers to build a plan with the worker that leads to employment/training opportunities. Additionally, the surveys also provide good indicators on what employment barriers exist (limited education, job skills, LEP) and hence allow for appropriate referrals to PA CareerLink® partners that can assist workers overcome such barriers. RR representatives maintain contact with the employer during the layoff/closure period to ensure that all workers receive the information presented at the RRIS. The RR representative also encourages the formation of a Dislocated Worker Transition Team. These teams are mostly made up of volunteer workers within the company that can serve as “a body” representing the voice of the workforce. Particular issues can be addressed such as further information on specific topics, development of newsletters and arrangement of smaller worker groups that address specific topics of interest.

Upon receiving notification from US DOL that a TAA petition has been approved/certified, the RR representative contacts the employer and union (where applicable). The federal program obtains a worker-list from the employer and sends out notification to all workers of the potential eligibility for Trade benefits. Next, the RR representative collaborates with local PA CareerLink® Trade, Title I and Unemployment Compensation service staff to set up a Trade Benefits Rights Interview (BRI) meeting date convenient for the employer and workers. The RR representative recommends BRI sessions to be held at the actual company site to maximize participation. Workers receive a personal invitation to the BRI session and obtain a copy of the information that will be reviewed during the meeting.

Rapid Response staff highlights the benefits that the Trade Act offers to assist in returning to the workforce by providing a detailed timeline for workers to follow. It emphasizes the services provided at the PA CareerLink® as a staging point to access Trade benefits in a timely manner. A strong emphasis is given to TAA training, High Priority Occupations and important deadlines that have an impact on time sensitive benefits. Case managers are present to schedule one-on-one appointments with TAA eligible workers who have an immediate interest in Trade benefits.

Rapid Response staff will also recommend the use of an Enrollment Assessment (EA) session to take place one to two weeks after the BRI is held, specifically for larger dislocations. EA sessions are a collaborative effort among PA CareerLink® partners present at the different stations set up for the EA. These stations serve the purpose of explaining Trade benefits on an individual basis, full-enrollment on the JobGateway® system, completion of dual-enrollment, initial skills assessment, WIOA supportive services, initiating the IEP, an overview of the Reemployment Trade Adjustment Allowance (RTAA) for workers 50 years of age or older, scheduling of a comprehensive assessment for participants interested in training, a review of the training programs and providers in the workforce area, and next steps/follow-up appointments. The EA sessions allow for a TAA eligible worker to go through a smooth process where there is a clear understanding of expectations and results. Furthermore, having the dual-enrollment completed at an early stage of case management allows for the TAA eligible worker to take full advantage of all workforce services offered under the PA CareerLink® umbrella. Once the EA session is completed, the worker identifies with a case manager, who then assists in making sure the worker accesses the TAA benefit(s) prior to an upcoming deadline. The EA session also allows for the local area to pull additional resources by having staff from other parts of the commonwealth assist with the logistics of such an event. It also allows for the case managers to identify the TAA workers who have a strong interest in using Trade benefits to secure suitable employment. The RR representative encourages the involvement of the DWTT to encourage workers to use Trade benefits and engage with the PA CareerLink® staff.

The commonwealth implemented an online application for TAA training, job-search and relocation allowances, the Alternative Trade Adjustment Assistance (ATAA) and Reemployment Trade Adjustment Assistance (RTAA) programs. This online application is accessed via the Internet, and dislocated workers, PA CareerLink® staff and training providers add information online. PA CareerLink® staff helps trade-affected workers complete their applications, and assess workers' skills and experiences.

The commonwealth uses Wagner-Peyser resources to provide career services for all job seekers. Pennsylvania's service delivery system provides greater choice and focuses resources where dislocated workers most need them. Dislocated workers receive all WIOA services in a comprehensive PA CareerLink® center. Pennsylvania co-enrolls all TAA-eligible workers in the WIOA program to ensure that all Trade participants receive the full range of assistance available to dislocated workers.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. IF THE STATE IS UTILIZING WORK-BASED TRAINING MODELS (E.G. ON-THE-JOB TRAINING, INCUMBENT WORKER TRAINING, TRANSITIONAL JOBS, AND CUSTOMIZED TRAINING) AS PART OF ITS TRAINING STRATEGY AND THESE STRATEGIES ARE NOT ALREADY DISCUSSED IN OTHER SECTIONS OF THE PLAN, DESCRIBE THE STATE'S STRATEGIES FOR HOW THESE MODELS ENSURE HIGH QUALITY TRAINING FOR BOTH THE PARTICIPANT AND THE EMPLOYER.

The commonwealth allows for and encourages on-the-job training (OJT), transitional jobs and customized training as integral parts of the workforce development strategy. OJT, transitional jobs and customized training have been used to get job seekers employed for many years. These training models allow job seekers to hone existing skills, learn new skills and technologies and gain experience to meet the requirements of a new occupation or industry. Work-based training will generally be aligned with the Pennsylvania High Priority Occupation list to ensure that jobs are in-

demand, have higher skill needs and are likely to result in family-sustaining wages. In cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry-level positions that provide the work experience necessary to lead to employment in HPOs. All OJT, transitional jobs and customized training is provided through contracts with employers in the private sector.

Incumbent worker training has long been a hallmark of Pennsylvania's workforce development system through Industry Partnerships and WEDnetPA. Both programs are funded through state budget appropriations. Each year, thousands of Pennsylvania incumbent workers receive training through these programs, allowing those individuals to be promoted along a career ladder and earn higher wages. Moving incumbent workers into higher positions also produces entry-level openings for other job seekers looking for employment opportunities.

2. DESCRIBE HOW THE STATE WILL INCORPORATE REGISTERED APPRENTICESHIP INTO ITS STRATEGY AND SERVICES.

The commonwealth is in the process of establishing a state Apprenticeship and Training Office (ATO) within L&I. The ATO will promote registered apprenticeship and pre–apprenticeship programs, provide technical assistance to employers and facilitate regional partnerships around the expansion of demand–driven registered apprenticeship programs across the commonwealth. The commonwealth is particularly interested in promoting the creation of non–traditional apprenticeship programs in industries, such as health care and agriculture, and occupations, such as food processing and information technology jobs, and in the recruitment and training of women, minorities, individuals with disabilities and other individuals with barriers to employment into apprenticeship programs. The commonwealth released a Nontraditional Apprenticeship grant availability using state Reemployment Funds in October 2015 to support the creation of new apprenticeship programs and the recruitment of women, minorities, individuals with disabilities and other targeted populations into existing apprenticeship programs.

ATO staff will provide outreach to PA CareerLink® centers to mentor state business service team staff in the benefits and promotion of apprenticeship as a viable training option for employers. Business service team staff will use their training to inform employers about apprenticeship opportunities, and in turn business service team members will forward information from interested employers to ATO staff, who will follow up on the leads to help employers create or expand registered apprenticeship programs. ATO staff will also assist community colleges and universities to register their programs with the Registered Apprenticeship College Consortium. The commonwealth also intends to add registered apprenticeship opportunities to JobGateway® and allow job seekers to search specifically for apprenticeship options.

The commonwealth partnered with unions, employers and community colleges as part of a federal grant application for apprenticeship funding. The commonwealth will continue to pursue collaborative models with the aforementioned partners. These collaborative models will provide successes and best practices which ATO will apply to creating or expanding additional registered apprenticeship programs, particularly within nontraditional career pathways. Through collaboration with state agency partners and programs, including PDE, DCED, OVR, DHS, DOC, the Department of Agriculture, PennSERVE, JobCorps and YouthBuild, the commonwealth will also be able to augment and enhance registered apprenticeships, as well as ensure the connection to career advancement, seamless transitions to postsecondary education and training, and a skilled workforce for Pennsylvania's employers.

3. PROVIDE THE PROCEDURE, ELIGIBILITY CRITERIA, AND INFORMATION REQUIREMENTS FOR DETERMINING TRAINING PROVIDER INITIAL AND CONTINUED ELIGIBILITY, INCLUDING REGISTERED APPRENTICESHIP PROGRAMS (WIOA SECTION 122).

The commonwealth issued Workforce System Policy No. 04–2015 detailing initial implementation of eligible training provider provisions of WIOA. The policy outlines the requirements for becoming and remaining an eligible training provider in accordance with federal law and regulations. Guidelines may be revised at a later time to ensure that eligible training providers and programs are aligned with career pathways once they are established.

The policy stipulates that all providers and programs eligible under WIA during Program Year 2014 are to remain eligible through June 30, 2016. New providers and programs seeking initial eligibility must, in general: have been in operation at least 12 months; provide program information; assure compliance with nondiscrimination, equal opportunity and ADA; demonstrate effectiveness; and agree to collect and provide performance data. In order to maintain eligibility a provider or program must meet the minimum established performance criteria. Full details regarding initial and continued eligibility requirements can be found in the linked policy.

Procedures for applying for initial eligibility are as follows:

1. Local workforce development boards solicit training providers in their local area to become an eligible training provider; training providers may independently apply to be an eligible training provider of WIOA title I–B services.

2. Providers seeking eligibility must complete an online application in CWDS.

3. Upon receipt of completed application and required information, the appropriate local workforce development board will review the application and each proposed program.

4. The local workforce development board will make a recommendation for approval or denial to the Department through CWDS; the Department will make the final eligibility determination and add the program(s) to the ETPL if the determination is favorable.

5. Once the Department has approved eligibility, the local board must ensure the provider completes a Memorandum of Understanding covering use of Personally Identifiable Information (PII) in student data, PA wage records, PA employment records, WRIS2, and FEDES, as applicable.

6. New providers will be added to the eligible training provider list as they become eligible. Initial eligibility remains in effect at least one (1) year.

The renewal process for continued eligibility generally follows steps 2 through 6 of the initial eligibility process described above. Training providers seeking to remain on the statewide ETPL must meet at least seven of the ten minimum performance criteria established by the Department.

Registered apprenticeship programs will also be part of the ETPL. Although registered apprenticeship programs are not subject to the same review procedures as other providers, the commonwealth must verify the status of programs to ensure they remain registered and in good standing. Initially, all registered apprenticeship programs in the commonwealth will receive a letter

with regard to procedures to opt–in to the ETPL. All registered apprenticeship programs are required to provide the following information to the Department as part of their procedures for inclusion on the statewide eligible training provider list:

• Occupations included within the registered apprenticeship program;

• The name and address of the registered apprenticeship program sponsor;

• The name and address of the related technical instruction provider, and the location of instruction if different from the program sponsor's address;

• The method and length of instruction; and

• The number of active apprentices.

Registered apprenticeship programs are not subject to the same information reporting requirements as other training programs. However, if Registered Apprenticeship programs volunteer to report performance information, the Department will accommodate such submissions.

The Department will verify the registration status of apprenticeship programs. Once the registration status has been confirmed, the entity will be added to the ETPL and the Department will notify the appropriate LWDB(s). Programs will remain on the list so long as the entity's registration status remains valid or until a program sponsor requests to have a program removed.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDING BY THE ADULT FORMULA PROGRAM.

Priority of service requirements will no longer be triggered by limited funds, but instead, such precedence will be provided based on an established grading of priority. The commonwealth, LWDBs, and PA CareerLink® centers shall provide priority to covered persons for the provisions of Title I Adult and Youth services. Additionally, the commonwealth shall allow for a local discretionary priority of service to be applied to individuals with barriers of employment for the provision of individualized career services and training services funded through the Adult program. Lastly, the commonwealth has established measures to monitor the implementation and assess the effectiveness of priority of service for this program.

"Priority of service" is the right to take precedence over non–covered persons in obtaining services.

"Taking precedence" means:

(i) The covered person receives access to the service earlier in time than the non–covered person; or

(ii) If the service is limited, the covered person receives access to the service or resource before the non–covered person.

“Covered persons” (as it applies to the Adult program priority of service) are veterans and eligible spouses; and individuals who are included in the WIOA priority groups, who are given priority over other individuals for receipt of individualized career services and training services funded by WIOA title I Adult Program.

“WIOA priority groups” (in relation to the Adult program priority of service) are the categories of individuals who are eligible to receive priority of service (i.e., recipients of public assistance; other low–income individuals; individuals who are basic skills deficient; and individuals who are both underemployed and low-income), and may include other categories of individuals with barriers to employment as established through a LWDB’s local discretionary priority.

“Recipients of public assistance” includes individuals who receive, or in the past six months have received, or are a member of a family that is receiving or in the past six months has received, assistance through one or more of the following: Supplemental Nutrition Assistance Program (SNAP); Temporary Assistance for Needy Families (TANF) program; Supplemental Security Income (SSI) program; or State or local income–based public assistance.

“Low–income individual” means an individual who:

(i) receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the SNAP, TANF, SSI, or State or local income–based public assistance;

(ii) is in a family with total family income that does not exceed the higher of—(I) the poverty line; or (II) 70 percent of the lower living standard income level;

(iii) is a homeless individual (as defined in the Violence Against Women Act) or a homeless child or youth (as defined under the McKinney–Vento Homeless Assistance Act);

(iv) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act

(v) is a foster child on behalf of whom State or local government payments are made; or

(vi) is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

“Individual who is basic skills deficient” means an individual who is:

(i) a youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or

(ii) a youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

Basic skills may be assessed using instruments that are considered valid and appropriate and/or via case manager observation and documented case notes. Standardized assessments will be administered following published guidelines, and locators/appraisals will be used to determine the appropriate level of use of such assessments. This assessment method must include reading,

writing, or computing skills. Soft skills deficiency or occupation skills deficiency shall not be used to determine otherwise proficient individuals as basic skills deficient. Case notes and other documents must provide an auditable trail back to the source of the verified information. This assessment method includes assessment questions, test results, school records, and/or referrals. Reasonable accommodation must be provided during the assessment process, if necessary, for individuals with disabilities.

“Individual who is both underemployed and low-income” is both:

(i) “Underemployed” is an individual who is:

• employed less than full-time and is seeking full-time employment

• employed in a position that is inadequate with respect to his/her skills and training

• employed but whose current job’s earnings are not sufficient compared to his/her previous job’s earnings from their previous employment, per state and/or local policy; and

(ii) A “low-income individual” as defined in WIOA Sec. 3(36). “Local discretionary priority” is a priority group established in addition to WIOA priority groups provided above; such priority may be used by LWDBs to meet the needs and vision of their respective local area.

The commonwealth allows LWDBs to identify and apply one local discretionary priority of service group to the established priority hierarchy. If a LWDB elects to develop a local discretionary priority, this priority group must include individuals with barriers to employment as defined in WIOA Sec. 3(24), may be created by adding a local requirement to one of the four required WIOA priority groups, and must last no less than one program year.

The following examples illustrate how priority of service will work: (i) Three individuals apply for training services. One is receiving public assistance, one is low–income, and the other does not fall into a priority category. There are two training slots available. In this scenario, the first two individuals take precedence over the third, meaning that the public assistance recipient and low–income person will receive training services and the non–covered person will not. (ii) The local board purchases ten slots for a short–term training program. Fifteen persons apply, seven of whom are eligible for priority of service, eight of whom are not. All seven of those entitled to priority of service will receive training slots; only three of the non–covered persons will receive training slots. (iii) Under the above example, with ten short–term training slots available, if only three of the fifteen people who apply are eligible for priority of service, those three will receive training slots.

In addition, the local board or PA CareerLink® will make affirmative efforts to conduct effective outreach to other individuals eligible for priority of service to ensure that at least 70 percent of slots are provided to those with priority of service. The commonwealth will monitor data reported by LWDBs and PA CareerLink® centers to determine the percentage of those individuals in the four WIOA priority groups who are being served through the Adult program in comparison to all other individuals (i.e., individuals who are not receiving required WIOA priority) who are being served through the Adult program. For this assessment, only individuals included in the four WIOA priority groups described above receiving value-added services through the Adult program funds will be counted as “individuals who are receiving priority.” Individuals made eligible for priority of service through local discretionary priority of service will be counted as “individuals who are not receiving any priority of service.” Should the percentage of “individuals who are receiving priority” be less than

70 percent, the commonwealth shall provide the LWDB or PA CareerLink® center with technical assistance to ensure that effective affirmative outreach efforts to individuals with priority of service are made. The 70 percent requirement applies to all individuals who receive Adult services. Note that 70 percent does not equate with satisfaction of priority of service requirements but is simply an indicator of whether affirmative outreach efforts are needed to ensure that those with priority of service are served.

In consideration of WIOA transition, during program year 2016, should the percent of individuals who are receiving priority be less than 51 percent in a local workforce development area, the commonwealth will provide technical assistance to assist LWDBs in effective outreach efforts to individuals who are included in WIOA priority groups.

Reflective of federal guidance in Training and Employment Guidance Letter 03–15, veterans and eligible spouses who are also recipients of public assistance, low income, basic skills deficient, or both underemployed and low income will receive first priority, non–veterans who are recipients of public assistance, low–income, basic skills deficient, or both underemployed and low income will receive second priority, veterans and eligible spouses not included in priority groups will receive third priority, non-veterans participating in the Adult program who are not included in any aforementioned priority group but who meet a local discretionary priority will receive fourth priority; and all other individuals will receive last priority.

In their local plans, LWDBs and PA CareerLink® centers will be required to state the additional methods by which they will apply the WIOA priority of service requirements and the commonwealth's policy regarding priority of service, and identify the local area's discretionary priority and any additional requirements, if a local discretionary priority group exists. LWDBs must communicate in their plans the methods to be used to apply priority of service requirements and any local discretionary priority, to include a description of the following:

(i) How they will obtain data reflecting each of the four groups of persons entitled to priority of service in their service area and the approximate numbers in each category.

(ii) The outreach they will do to inform the public of Pennsylvania's priority of service policy and how they will target this outreach to best reach those potentially eligible for priority of service and any agencies that serve them.

(iii) How they will inform individuals seeking to access WIOA services of their priority of service, such as through posters and prominent placement of other information.

(iv) When otherwise deemed eligible for program participation, how they will affirmatively identify persons entitled to priority of service and inform those individuals of the full array of services available.

(v) The assessments they will use to identify barriers to employment among those entitled to priority of service and the services needed to address them.

(vi) The process by which they will develop Individual Employment Plans for persons entitled to priority of service that will address, in addition to career service and training needs, any barriers to employment they may have.

(vii) How they will ensure that they are serving the spectrum of persons entitled to priority of service, including those, such as English language learners, who may require more resources to serve.

(viii) How they will address the special needs of individuals with barriers to employment in the delivery of services, such as by assuring that appropriate career planning services are provided. This should include a detailed description of how appropriate career planning services will be provided, or arranged for, through collaboration with other agencies in the event that the LWDB or PA CareerLink® center lacks the required expertise.

(ix) How they will ensure access to services, i.e., interpreters and translated documents, for English language learners, as well as for persons who are deaf or hard of hearing.

(x) How they will train staff to ensure that staff members have an understanding of who is entitled to priority of service and that the office is responsive to the needs of these groups.

(xi) What, if any, local discretionary priority of service has been established for a specific program year and what data will be used to support the need or benefit for the discretionary priority.

LWDBs and PA CareerLink® centers will be required to collect data reflecting, for each of the three categories of persons with priority of service, the numbers of persons who are served and the levels of performance achieved. LWDBs and PA CareerLink® centers will be required to use between 5 percent and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service.

More information regarding WIOA Title I Adult program priority of service is provided in the commonwealth's priority of service policy, developed as a part of the "Initial Implementation of WIOA Series" to assist in the transition to the new workforce act. The commonwealth's priority of service policy will be revised to align with the (pending) State Plan and Federal regulations.

5. DESCRIBE THE STATE'S CRITERIA REGARDING LOCAL AREA TRANSFER OF FUNDS BETWEEN THE ADULT AND DISLOCATED WORKER PROGRAMS.

WIOA provides flexibility to local WDBs to provide services in the areas of greatest need by allowing fund transfers of up to 100 percent of a program year allocation between the local adult and the local dislocated worker allocations. In accordance with WIOA's regulations that require the governor to establish factors for approving such transfers, the commonwealth provides the following criteria for local WDBs to request transfers between these funding streams:

• Local boards must seek approval for transferring funds between the adult and dislocated worker funding allocations by submitting a transfer request to BWDA. In order for a transfer request to be approved and fully executed prior to June 30, all transfer requests must be received no later than April 15. Written requests must be submitted to Labor & Industry on a Funds Request Form as directed in the WSP 03-2015, Financial Management Guide page 5-8 through 5-9 and Appendix A.

• A local area must consider how it will meet adjusted levels of performance for the primary indicators before requesting such transfer since the negotiated levels of performance for the primary indicators remain in effect.

• Local boards must attest to the following when submitting a transfer request:

o Employment and training activities of the program that funds are being transferred from or the program that funds are being transferred will not be adversely impacted.

o Any transfer of funds from the dislocated worker program to the adult program to be adult program funds fall under the priority requirements of the adult program. Likewise, any transfer of funds from the adult program to the dislocated worker program will fall under the requirements of the dislocated worker program;

o A local area is still responsible for meeting the adjusted levels of performance for any participants that it is required to serve; and

o When funds are transferred from one program to another, the transferred funds adopt the identity of the new fund source and are bound by all of the requirements of that source.

As indicated in the commonwealth's workforce system policy (WSP) on financial management, the maximum dollar amount that a local area can transfer is calculated against the total base annual allocation (excluding any transfers or other adjustments to the allocation amount) for the funding stream that the funds are being transferred from. It should also be noted that administrative funds must be included with the transferred program funds based upon a 90/10 percent program to administrative split. Therefore, local areas must have adequate administrative funds available before BWDA will approve a transfer request.

For reference, transferred funds retain their federal year-of-appropriation identity and must be accounted for and reported accordingly. For example, PY 2016 WIOA Adult funds can only be transferred to the PY 2016 WIOA Dislocated Worker program. All transfers assume the identity and applicable requirements of the funding stream receiving the transfer. Expenditures associated with the transferred funds have to be tracked or accounted for separately. Transferred funds are accounted for, and reported, as part of the total available funds in the originally allocated program.

Transfer requests approved will result in a separate NOO and contract number being issued for the transferred amount, while the program in which the amount is being transferred from will be revised to reflect the reduced allocation. The issuance of said NOOs will serve as a local area's official notification that the transfer is approved. Conversely, local areas will receive notification of any transfer request that is not approved.

C. YOUTH PROGRAM REQUIREMENTS

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS.*

* Sec. 102(b)(2)(D)(i)(V)

Every local workforce development board will be required to have a youth standing committee, whose activities may include but are not limited to the following:

• Providing information and assisting with planning, operational oversight, and other issues relating to the provision of services to youth.

• Recommending policy direction to the local board for the design, development, and implementation of programs that benefit all youth.

• Recommending the design of a comprehensive community workforce development system.

• Recommending ways to leverage resources and coordinate services among schools, public programs, and community–based organizations serving youth.

• Recommending ways to coordinate youth services and recommend eligible youth service providers.

• Providing on–going leadership and support for continuous quality improvement for local youth programs.

• Overseeing eligible youth providers and other aspects of youth programs.

The commonwealth will strongly encourage local workforce development boards and their youth standing committees to think comprehensively and systematically about youth programs and services described in Section 129 of WIOA, and to establish youth priorities in the WIOA Local Plans that allow for the service of as many eligible youth as possible, especially OSY, older youth and those young people who are most at risk of not acquiring the necessary skills and abilities to attain meaningful employment.

The success of a solid youth program that fulfills the intent of WIOA largely depends on the full and openly competitive procurement of qualified providers of the youth workforce investment activities outlined in Section 129 of WIOA, and active oversight of their performance in accordance with WIOA Section 116.

This begins with the incorporation of WIOA's youth program requirements into future Requests for Proposals (RFPs) and subsequent contracts, as well as existing youth provider contracts.

Such requirements include:

• the expenditure of a minimum of 75 percent of funding on services to out–of–school youth;

• the expenditure of 20 percent of funding on the provision of work experiences for youth, including those with significant barriers to employment;

• the development of strong career pathways for youth;

• the co–enrollment of eligible youth into appropriate partner programs and activities, including TANF;

• the provision of the 14 required youth program design elements;

• the provider's past record of success with the retention of youth participants in education, training activities, or unsubsidized employment during the second and fourth quarters after program exit; and

• a detailed description of the local board's negotiated performance goals with the commonwealth for which the provider has a role in meeting and/or exceeding.

To ease burdens on both applicants and providers and serve out–of–school youth who are most in need, the commonwealth will allow self–attestation for out–of–school youth for the purpose of WIOA eligibility determination, consistent with federal rulemaking. The commonwealth will require LWDBs and youth service providers to accept such self–attestation. An applicant will become eligible for youth services by providing a statement that addresses the required element that may make the applicant eligible to receive services as an out–of–school youth, signing and dating a form acknowledging this status, followed by verification conducted by workforce staff that such information meets WIOA eligibility criteria for out–of–school youth. The key elements for self–attestation are: the participant identifying his or her status for permitted elements and signing and dating a form attesting to this self–identification. The commonwealth will work with LWDBs to develop additional self–attestation policies and procedures that are consistent with the commonwealth's self–attestation policy. Additionally, local areas are strongly encouraged to employ single–year provider contracts with the inclusion of a renewal option for additional years, rather than multi–year contracts. Local boards will establish criteria to ensure that newer provider entities with less professional experience in the provision of youth services are afforded the opportunity to compete with more established providers for a contract. Criteria will also be established and included in contracts that outline the right of the local board to terminate a provider's contract for cause, such as fraud or failure to meet established performance standards. The commonwealth will also work with LWDBs to explore the use of pay–for–performance approaches, as appropriate, when they appear to have the potential to produce positive returns on investment and also result in better services for the target population. Finally, the commonwealth will encourage LWDBs to cooperate with Industry Partnerships and other multi–employer workforce partnerships, where relevant, on industry–specific career awareness, school–to–work, and other pipeline activities for youth.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, AND COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

WIOA increases the minimum out–of–school youth (OSY) expenditure rate from the 30 percent required under WIA to 75 percent—a shift that signifies a much greater focus of both dollars and resources on the OSY population, especially for those OSY who face the greatest challenges to attain meaningful employment. This conversion also allows for greater support for the educational and career success of OSY.

This paradigm shift requires adjustments at every layer of the workforce system. Early in WIOA's implementation process, the commonwealth developed several WIOA workgroups comprised of stakeholders from various levels of Pennsylvania's workforce system. An overall goal of the WIOA Youth Service Workgroup was to provide recommendations that would serve to help build a workforce system to meet the demands of today's customers and employers, as well as future demands.

As workgroup members, representatives from Pennsylvania's youth–serving organizations examined multiple strategies focused around intensive outreach and the engagement of disconnected youth and young adults, which resulted in recommendations around co–enrollment, partnerships, career pathways/sector strategies, retention, and performance measures. The Department is developing its overall youth strategy, in part, as a result of the recommendations from this workgroup.

One such strategy has led to the issuance of a guidance document that provided new definitions for youth to enable a larger number of OSY to be more efficiently served—a policy embraced by each of Pennsylvania's core partners.

In addition to the work being done at the state level, local boards are to prioritize the adoption of the following strategies to effectively serve their youth population:

• Recruitment and Outreach. Conduct activities, including outreach to local government facilities, non–profit and faith–based organizations that provide support services to disconnected youth and young adults; including the use of word–of–mouth referrals, and social media platforms. Other suggested activities for youth services provider staff include:

o Visiting local parks, tattoo parlors, smoke shops, homeless shelters, and other places that disconnected young people are known to frequent and speaking to them one–on–one in that environment, and in terms that make them the most comfortable.

o Going into low–income communities and neighborhoods, knocking on doors, and speaking to friends, families, and young adults about available services and opportunities.

o Creating a program application process that is easy to complete by removing as many of the administrative hurdles as possible.

o Using text messages and social media. While this strategy may not be as effective for recruitment, it is a highly effective strategy for keeping participants engaged, as well as reconnecting those participants who have disconnected from the program.

o Considering the tailoring of strategies for young adults by age group, 18–21 and 22–24. Younger individuals may be more ready to enroll in programs when compared to older individuals. Young adults, ages 22–24, are more likely to have been unemployed or separated from educational institutions longer than those in the younger age group. This older group requires more resource–intensive outreach and recruitment efforts. An emphasis on available work experiences and employment services, rather than education and basic skill building, is preferred for this older group. However, when older youth and young adult clients have low literacy and numeracy levels, local areas should consider integrated, contextual strategies that blend work experience and education.

• Engagement. Many disconnected young adults face challenges and life obstacles that result in the cycling in and out of program services. Such challenges are many and varied. They may include: periods of homelessness, issues with the criminal justice system, pressures to provide for their families, and substance abuse, among others.

Recognizing the unique hardships of each individual and working to establish trust between participants and staff, that is respectful of roadblocks preventing regular attendance, creates an atmosphere where participants feel staff is invested in their success.

The Department has recommended the following to be considered as part of a local area's youth strategy:

o Once a participant is enrolled, communicate regularly and effectively. Explain the program's available services and activities, the expectations of the participant, and any available support services that may be necessary.

o If a participant disengages from the program at any point, calls, texts, visits and messages on social media are ways to find out why the participant is no longer engaged and let the participant know that he or she can return whenever he or she is ready. Engage adult mentors along with case managers. Such mentors can play a key role in keeping participants engaged with the program.

o Set achievable goals with the participant early in the process and communicate the status of progress towards meeting those goals often.

o Engage peers. Placing young adults in cohorts allows individuals to move through the program and receive services with others. Participants often become friends and gain a sense of togetherness and accountability within the cohort. Such engagement may also open the door for young adults to take a leadership role, such as tutoring other participants, giving presentations, etc.

o Ensure that supportive services are made available to participants to help remove barriers that would prevent them from continuing with the program.

o Encourage Re–engagement. If an individual leaves the program, the case manager/youth provider staff and adult mentor should remain in contact with that individual and encourage re–engagement through phone calls, texts, social media, or in–person visits at their 'hangouts' or homes.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED.*

* Sec. 102(b)(2)(D)(i)(I)

The commonwealth is supporting Business–Education Partnerships in the form of $1.6 million in grant funding, distributed in 2014, for the purpose of connecting local businesses with school districts to promote job opportunities and career pathways. These programs increase awareness of in–demand technical careers for students, their parents, and educators to engage more students in the technical skills required by employers. The partnerships connect schools, employers and students to provide career–related experiences and exposure opportunities for students through soft skills development, internships, workplace shadowing, and career mentoring. To the extent feasible, Business–Education Partnerships should include representatives (both staff and employers) of area Industry Partnerships and apprenticeship programs that connect to multiple employers with good jobs. The commonwealth will continue its support of Business–Education Partnership activities going forward.

In 2015, the commonwealth made available a $4 million special appropriation of funding to local boards, as a supplement to the customary $15 million full program year allocation of TANF Youth Development Funds (YDF). This TANF special appropriation was designated to allow for the provision of summer youth workforce investment activities for even more TANF–eligible youth. Funds were also provided to Philadelphia and Pittsburgh, as discussed in the strategic portion of the plan, to pilot new and innovative summer employment initiatives. The commonwealth will consider the results of those pilots in developing future approaches to serving youth.

Additionally, the commonwealth is designing a paid summer internship program for disadvantaged youth ages 16–18, including youth with disabilities. This 8–week program will kick–off during the summer of 2016. Multiple state agencies and offices, including PA CareerLink® centers, will serve as worksites providing opportunities for valuable work experiences, with a strong focus on “soft skills” to area youth. State staff will act as supervisor/mentors for youth participants.

The Department of Labor & Industry is the lead agency in the development of the internship program framework, which includes the development of training plans, the recruitment process for eligible youth, and the assignment of youth to worksite rotations based on identified areas of interest. Approximately, $3.5 million is being designated for this first year of program activity.

In addition to WIOA’s about–face from WIA’s ISY primary focus, the new legislation revises the delivery of youth services through the addition of new programmatic elements. WIOA added five new program elements to ones originally outlined under WIA, including: financial literacy education; entrepreneurial skills training; the provision of labor market and employment information about in–demand industry sectors or occupations available in a local area; activities that help youth prepare for and transition to post–secondary education and training; and education offered concurrently with and in the same context as workforce preparation activities and training for a special occupation or occupational cluster. The Department highly encourages local boards and their standing youth committees to focus their allocated youth funds in support of a service delivery system that aligns with the governor’s goals and priorities.

One of the required elements focuses specifically on work experiences for youth. WIOA requires local areas to spend a minimum of 20 percent of WIOA youth funds on work experience activities,

including paid and unpaid work experiences such as: summer and other employment opportunities throughout the year; pre–apprenticeship programs; internships and job shadowing; and on–the–job training opportunities for youth and young adults.

As a result of the transformation in focus from ISY to OSY, especially disconnected youth and those young people who face barriers to employment, local boards are required to develop stronger year–round programs and work experiences that create opportunities for those young adults who are most in need of the services. Such programs and experiences may include, but are not limited to:

• Programs that combine “learn and earn” opportunities that maximize part–time employment as students build academic skills.

• Transitional jobs. Such opportunities allow young adults to gain meaningful work experience, create a work history, and develop the skills needed to promote workplace success.

• Pre–apprenticeships and apprenticeships. These programs combine work–based opportunities for out–of–school youth.

• Utilizing work–based training opportunities such as OJT, internships and job–shadowing for this youth population.

Additionally, local boards must develop solid working relationships with service providers that have demonstrated experience in working with an older youth population, especially those young people who face barriers to employment. Such relationships will lead to a strong system of workforce investment programs and activities aimed at meeting the needs of Pennsylvania’s youth and young adults, while fulfilling the requirements outlined in WIOA.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR “REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR “REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII).

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

Pennsylvania law and regulations discuss “alternative education” in the context of alternative education for disruptive youth. School districts are obligated to educate students of compulsory school age who have been excluded from school (expelled). The courts have ruled that local school officials may determine the amount and type of alternative instruction necessary and appropriate in each case involving an expelled student. Pennsylvania law defines a “private alternative education

institution” as an institution operated by an individual or a for–profit or not–for–profit entity to provide alternative education programs as defined in section 1901–c(1).

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE “NOT ATTENDING SCHOOL” OR “ATTENDING SCHOOL” INDICATE THAT IS THE CASE.

The commonwealth’s Workforce System Guidance No. 03-PY2015, Youth Eligibility Definitions—Initial Implementation of the Workforce Innovation and Opportunity Act, December 23, 2015, provides definitions to ensure compliance with law and other federal guidance, expand the flexibility of local areas to expend funds appropriately, and eliminate barriers to the provision of services to individuals most in need.

Under WIOA, a key element of youth eligibility determination is whether or not the applicant is attending school or not attending school, as defined by State law. An ISY must be attending school, while OSY must not be attending school. Unfortunately, Pennsylvania law does not define these terms, but the policy is guided by how the Pennsylvania Department of Education defines schools. In Pennsylvania, providers of youth services must establish whether a youth is an ISY or OSY by utilizing the criteria outlined below:

Attending Any School. Youth receiving services from any one of the ‘public’ or ‘non-public’ institutions to include: school districts; charter schools; cyber charter schools; area vocational technical schools; sectarian schools; and private schools, as well as those being home-schooled or privately tutored, would be considered “attending school” for the purpose of WIOA Title I-B youth eligibility determination. A youth enrolled at a post-secondary institution would also be considered to be “attending school,” unless the youth is enrolled at the post-secondary institution as part of an integrated education and training program.

Not Attending Any School. Youth not receiving services from any one of the ‘public’ or ‘non-public’ institutions listed above would be considered “not attending school” for the purpose of WIOA Title I-B youth eligibility determination.

For purposes of WIOA eligibility, the Department does not consider providers of adult education under title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools. Therefore, in all cases except the one provided below, WIOA Youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if he or she attends adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception; they are considered ISY. Youth must be categorized as OSY or ISY at the time of registration in the Commonwealth Workforce Development System (CWDS).

6. IF NOT USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE SPECIFIC STATE DEFINITION.

The commonwealth will utilize the “basic skills deficient” definition contained in WIOA Section 3(5)(B) as follows:

Basic skills deficient – The term “basic skills deficient” means, with respect to an individual: (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

The commonwealth will convene panels of local representatives to assist LWDBs in interpreting and implementing this definition.

D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must also include:

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES, INCLUDING AN IDENTIFICATION OF SUCCESSFUL PROVIDERS OF SUCH ACTIVITIES. (WIOA SECTION 108(B)(9).)

N/A

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their Title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;

4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:

A. SUPPORTING EMPLOYER ENGAGEMENT;

B. CONNECTING EDUCATION AND TRAINING STRATEGIES;

C. SUPPORTING WORK-BASED LEARNING;

D. IMPROVING JOB AND CAREER RESULTS, AND

E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE PROCESS USED TO:

A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;

B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;

C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;

D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.

E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver;

The commonwealth does not request any waivers at this time.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. No

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure

compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

1. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS.

Within the Bureau of Workforce Partnership and Operations, Staff Development Services will continue to develop, facilitate, and provide a training curriculum that strengthens the professional skills of co-located partners' staff in PA CareerLink® centers and Local Workforce Development Board offices, as well as the bureau's staff in headquarters and regional locations, who provide programmatic expertise, guidance, and support to the one-stop career centers and local areas. The curriculum is designed, delivered, and evaluated to ensure staff from all partnering organizations have the opportunity to acquire consistent information and practical skills to effectively provide integrated programs and services to jobseeker and business customers. In addition, the Staff Development unit will continue to assist the bureau's programmatic managers and staff in creating procedural and informational products that ensure accuracy and consistency among the commonwealth's PA CareerLink® centers.

2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

The Office of Unemployment Compensation Benefits Policy (OUCBP) will provide annual training to PA CareerLink® staff on the identification of UI eligibility issues. This training will include how to identify and refer a potential issue to the UC service center. The Department will monitor the number of cases being referred to the UC service center to ensure that the PA CareerLink® staff is fulfilling this requirement.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE.

L&I uses a sophisticated automated call distribution (ACD) system to receive calls from UI customers. The ACD system allows the Department to prioritize calls. The system is designed to give calls from the PA CareerLink® courtesy telephone the highest priority. When calling from a courtesy telephone located at the PA CareerLink®, the customer hears the greeting and makes a service selection. The caller is then placed at the top of the queue and routed to the next available customer service agent in the UC service center. This keeps call wait time for these customers to a

minimum. All customer service agents are fully trained merit staff capable of handling the caller's questions and taking and processing UI claims.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UNEMPLOYMENT INSURANCE CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS.

Reemployment services are available to all UI claimants and other unemployed individuals through PA CareerLink® centers and JobGateway®. Information about reemployment services and instructions for enrollment are printed on the UI claim confirmation letter and in the Pennsylvania Unemployment Compensation Handbook sent to every UI claimant. Pennsylvania implemented formal work search and registration requirements for UI claimants effective January 2012. Pennsylvania UC law requires claimants to register for employment search services with the PA CareerLink® system within 30 days of filing for benefits. Beginning with the third week of the benefit year for which a claimant for compensation is filed and each week thereafter, the claimant must apply for two positions and participate in one work search activity each week and maintain records of their work search efforts.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE, INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

As mentioned above, Pennsylvania UC law requires claimants to register for employment search services with the PA CareerLink® system within 30 days of filing for benefits. When a claimant applies for UC benefits, s/he is immediately directed to JobGateway® to register for employment search services where occupational skills information is collected. The JobGateway® portal matches the claimant's skills with those required for jobs posted in CWDS to help satisfy job–search requirements. The system can also suggest training and education programs that may assist the individual in increasing his or her reemployment prospects. Claimant participation in reemployment services is tracked until exhaustion of UC benefits or termination of reemployment services.

In addition to PA CareerLink® services available to all job seekers, the Profile Reemployment Program is Pennsylvania's worker profiling/reemployment services collaborative program to expedite reemployment services for UI claimants while eliminating duplicative services. The database systems rank claimants according to those most likely to exhaust their UI benefits before returning to work. The ranking algorithms, based on common characteristics found in similar unemployed workers (such as employment history and/or educational levels), exclude claimants with a recall date, union affiliation, those involved in a work stoppage and claimants who are working part–time. Collaboration among PA CareerLink® partners makes the Profile Reemployment Program an effective means for UI claimants to obtain reemployment and training services across all service levels, including: orientations; job search planning, assistance, and workshops; labor market information; résumé preparation; program assessment; vocational and career guidance; testing; remedial or prerequisite training (e.g., GED or ESL); and skills training. All Profile Reemployment Program customers receive an employment needs assessment and an appropriate employment plan is developed. Participation in the program is tracked through CWDS until exhaustion of UI benefits or termination of reemployment services.

In four PA CareerLink® centers (Scranton, Wilkes–Barre, Hazleton and Tannersville), the RESEA program is being piloted. RESEA is supported by a federal grant to fund additional services to assist UI claimants in becoming reemployed. The Profile Reemployment Program will be suspended in the four PA CareerLink® centers piloting RESEA. L&I will select and notify UC claimants to participate in RESEA. Those chosen to participate are identified as mostly likely to exhaust UC, with military (UCX) claimants receiving first priority as required by the grant. A UC–24, RESEA Notice will be mailed to those claimants selected to participate in RESEA in the pilot region. The notice informs claimants that participation in RESEA activities is mandatory and to watch for additional mailings from their local PA CareerLink® center.

The RESEA will consist of a group orientation and an individual meeting with PA CareerLink® staff. The group orientation will consist of an introduction to the RESEA participation requirements and the services provided by the PA CareerLink®. Following the group orientation, claimants will be provided a one–on–one interview to further assess reemployment services needed, development of an Individual Employment Plan (IEP) and review and confirmation of the information the claimant provided on the UC eligibility assessment. PA CareerLink® staff will summarize the RESEA meeting on an outcome form, complete a checklist, and provide this information to UC. Each RESEA participant will be scheduled for a subsequent RESEA four weeks later. During the subsequent appointment, conducted by telephone, PA CareerLink® staff will review and update the IEP, provide additional reemployment assistance, and determine if additional services are needed through the PA CareerLink®. Any claimant remaining unemployed four weeks later will be scheduled for a second subsequent RESEA, also to be conducted by telephone. Any UC eligibility issues identified during the RESEA initial or subsequent interviews will be promptly reported to UC for adjudication.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

As mentioned above, Pennsylvania UC law requires claimants to register for employment search services with the PA CareerLink® system within 30 days of filing for benefits. When a claimant applies for UC benefits, s/he is immediately directed to JobGateway® to register for employment search services where occupational skills information is collected. The JobGateway® portal matches the claimant’s skills with those required for jobs posted in CWDS to help satisfy job–search requirements. The system can also suggest training and education programs that may assist the individual in increasing his or her reemployment prospects. Claimant participation in reemployment services is tracked until exhaustion of UC benefits or termination of reemployment services.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

As mentioned above, Pennsylvania UC law requires claimants to register for employment search services with the PA CareerLink® system within 30 days of filing for benefits. When a claimant applies for UC benefits, s/he is immediately directed to JobGateway® to register for employment search services where occupational skills information is collected. The JobGateway® portal matches the claimant’s skills with those required for jobs posted in CWDS to help satisfy job–search requirements. The system can also suggest training and education programs that may assist the individual in increasing his or her reemployment prospects. Claimant participation in reemployment services is tracked until exhaustion of UC benefits or termination of reemployment services.

In addition to PA CareerLink® services available to all job seekers, the Profile Reemployment Program is Pennsylvania's worker profiling/reemployment services collaborative program to expedite reemployment services for UI claimants while eliminating duplicative services. The database systems rank claimants according to those most likely to exhaust their UI benefits before returning to work. The ranking algorithms, based on common characteristics found in similar unemployed workers (such as employment history and/or educational levels), exclude claimants with a recall date, union affiliation, those involved in a work stoppage and claimants who are working part–time. Collaboration among PA CareerLink® partners makes the Profile Reemployment Program an effective means for UI claimants to obtain reemployment and training services across all service levels, including: orientations; job search planning, assistance, and workshops; labor market information; résumé preparation; program assessment; vocational and career guidance; testing; remedial or prerequisite training (e.g., GED or ESL); and skills training. All Profile Reemployment Program customers receive an employment needs assessment and an appropriate employment plan is developed. Participation in the program is tracked through CWDS until exhaustion of UI benefits or termination of reemployment services.

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The RESEA will consist of a group orientation and an individual meeting with PA CareerLink® staff. The group orientation will consist of an introduction to the RESEA participation requirements and the services provided by the PA CareerLink®. Following the group orientation, claimants will be provided a one–on–one interview to further assess reemployment services needed, development of an Individual Employment Plan (IEP) and review and confirmation of the information the claimant provided on the UC eligibility assessment. PA CareerLink® staff will summarize the RESEA meeting on an outcome form, complete a checklist, and provide this information to UC. Each RESEA participant will be scheduled for a subsequent RESEA four weeks later. During the subsequent appointment, conducted by telephone, PA CareerLink® staff will review and update the IEP, provide additional reemployment assistance, and determine if additional services are needed through the PA CareerLink®. Any claimant remaining unemployed four weeks later will be scheduled for a second subsequent RESEA, also to be conducted by telephone. Any UC eligibility issues identified during the RESEA initial or subsequent interviews will be promptly reported to UC for adjudication.

4. PROVISION OF REFERRALS TO AND APPLICATION ASSISTANCE FOR TRAINING AND EDUCATION PROGRAMS AND RESOURCES.

As mentioned above, Pennsylvania UC law requires claimants to register for employment search services with the PA CareerLink® system within 30 days of filing for benefits. When a claimant applies for UC benefits, s/he is immediately directed to JobGateway® to register for employment search services where occupational skills information is collected. The JobGateway® portal matches the claimant's skills with those required for jobs posted in CWDS to help satisfy job–search requirements. The system can also suggest training and education programs that may assist the

individual in increasing his or her reemployment prospects. Claimant participation in reemployment services is tracked until exhaustion of UC benefits or termination of reemployment services.

In addition to PA CareerLink® services available to all job seekers, the Profile Reemployment Program is Pennsylvania's worker profiling/reemployment services collaborative program to expedite reemployment services for UI claimants while eliminating duplicative services. The database systems rank claimants according to those most likely to exhaust their UI benefits before returning to work. The ranking algorithms, based on common characteristics found in similar unemployed workers (such as employment history and/or educational levels), exclude claimants with a recall date, union affiliation, those involved in a work stoppage and claimants who are working part–time. Collaboration among PA CareerLink® partners makes the Profile Reemployment Program an effective means for UI claimants to obtain reemployment and training services across all service levels, including: orientations; job search planning, assistance, and workshops; labor market information; résumé preparation; program assessment; vocational and career guidance; testing; remedial or prerequisite training (e.g., GED or ESL); and skills training. All Profile Reemployment Program customers receive an employment needs assessment and an appropriate employment plan is developed. Participation in the program is tracked through CWDS until exhaustion of UI benefits or termination of reemployment services.

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E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE--

1. ASSESSMENT OF NEED

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The Agricultural Outreach Plan discusses Pennsylvania efforts related to serving Migrant and Seasonal Farmworkers (MSFW), temporary foreign labor obtain through the H–2A program and in serving agricultural employers through the PA CareerLink® system. The Department of Agriculture, Department of Labor & Industry and other relevant state agencies as necessary, will work together to ensure that agricultural workers and employers needs are met. As part of that collaboration, the two departments will encourage agricultural employers to create multi–employer workforce partnerships and apply for funding through the Industry Partnership program.

A. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE.

Agriculture is one of Pennsylvania's leading industries, with a diversity of animal and crop production throughout the commonwealth. Pennsylvania ranks first in the nation in mushroom production, second in Christmas tree farms, third in apple production and fifth in terms of the number of dairy cows. Lancaster County is the top agricultural county in the state.

In Pennsylvania, the agriculture footprint is unique to certain geographical areas. The southeast part of the state produces 62 percent of the nation's mushrooms. The eastern part of the state has considerable blueberry and cherry production. Bucks, Montgomery, and Lancaster Counties are hubs for wholesale nursery production. Lancaster County leads the commonwealth in animal agriculture including dairy, poultry, and swine. The south central part of the state is considered the fruit belt with Adams and Franklin Counties leading in the production of apples, peaches, cherries, and pears. Bedford and Blair Counties also have numerous apple growers. Central Pennsylvania is the heart of the Christmas tree industry while northwestern Pennsylvania leads a burgeoning wine industry that also has pockets throughout the commonwealth. Grapes, cherries, vegetables, and nursery production fills out production categories in the western part of the state.

According to the 2012 Census of Agriculture, the five leading labor-intensive crops (where the most hired farm labor is employed) are Greenhouse, Nursery, and Floriculture Production (NAICS code 1114) (16,628 employed); Dairy Cattle and Milk Production (NAICS code 11212) (4,045); Other Crop Farming (NAICS code 1119) (6,818); Fruit and Tree Nut Farming (NAICS code 1113) (6,434); and

Oilseed and Grain Farming (NAICS code 1111) (5,683). The commonwealth as a whole had 65,487 workers employed as hired farm labor.

Counties that led in the employment of hired farm labor include Lancaster (8,768); Chester (8,530); Adams (3,191); Franklin (2,652); York (2,476); Erie (2,204); Schuylkill (1,292); Cumberland (1,175); Bedford (1,046); and Snyder (1,014).

Further, using the Census, Adams (1,109); Chester (880); Franklin (441); Erie (171); Lancaster (162); Cumberland (158); Bedford (156); York (130); Columbia (105); and Washington (62) are the top counties where the migrant workforce has been deployed. The five leading crops where the migrant workforce is employed include Fruit and Tree Nut Farming (NAICS code 1113) (119); Dairy Cattle and Milk Production (NAICS code 11212) (90); Greenhouse, Nursery, and Floriculture Production (NAICS code 1114) (71); Vegetable and Melon Farming (NAICS code 1112) (43); and Oilseed and Grain Farming (NAICS code 1111) (29). Companies in the commonwealth as a whole employed 4,288 migrant workers.

In comparing these statistics, it seems clear that the agriculture community uses migrant farmworkers to supplement the workforce that they find in their local areas. There is a much higher percentage of the workforce in some counties such as Adams and Franklin than there is in the larger agriculture counties such as Lancaster and Chester. There is also a higher percentage of workers in crops that are more seasonal, presumably helping with planting and harvest at key times.

Records related to the H-2A program confirm that assumption in that the busiest times for applications are from December to January with consistent activity continuing through June and July.

In general, employers in the agriculture and food industry express the need for more workers, particularly in the seasonal parts of the business. There is intense competition for low-skill, low-wage workers between the agriculture, retail, hospitality, health care and other industries.

Temporary help services and farm labor contractors compete for the migrant workforce in the agriculture, construction and landscaping industries. This competition is reflected in the low unemployment rate in many of the counties that use hired farm labor.

This overall scarcity of workers will be the factor which most dramatically affects the agriculture and food industry in the future. Housing and transportation as well as training for agriculture tasks as the work gets more sophisticated will be additional challenges. The industry itself is experimenting with technology that may allow machines to replace some of the manual labor that is currently required.

B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH

AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION.

The Department of Labor & Industry, working with the PA Department of Agriculture, the National Agriculture Statistical Service of the US Department of Agriculture, PathStone (the WIOA Section 167 National Farmworker Jobs Program grantee for the commonwealth), Penn Ag Industries and other agriculture employer organizations and agriculture employers themselves, has assembled this profile of the MSFW in Pennsylvania.

Of all enrolled, eligible farmworker participants 76 percent were of Hispanic descent (Mexico, Haiti and Puerto Rico), while 24% were of Haitian, African-American, or Caucasian descent. The first languages most commonly spoken were Spanish and Creole with 44 percent of all farmworkers being limited English proficient and illiterate in their own native tongue. Just fewer than 4,300 farmworkers are employed annually with the peak months for employment in south central Pennsylvania being May through November and in southeastern Pennsylvania being September through April. These differences can be attributed to the differing needs of the mushroom and fruit industries primarily. Of all farmworkers, 76 percent are seasonal and 24 percent are migrants.

BWPO recognizes that some farmworkers possess specific needs and face certain barriers that result from cultural, educational, linguistic, scheduling, logistic and other dynamics. The Administration will continue to seek stakeholder and customer input and will engage Migrant Seasonal Farmworker (MSFW) service providers to identify and address needs, explore solutions and collaborate in order to ensure quality living and working conditions.

Farmworker needs include, but are not limited to, the following:

• Timely labor market information to facilitate planning for continuous employment;

• Occupational guidance and training to maintain a job or transition into a different occupation or industry;

• Transportation to seek employment or supportive services;

• Affordable and adequate housing;

• Information from various jurisdictions on labor laws and worker rights, protections, and responsibilities;

• Supportive services to enable MSFWs to obtain and maintain employment;

• Fair and equitable conditions and supervision from trained and committed field foremen, supervisors and farm labor contractors;

• Fair and equitable pay that includes health benefits. This is a necessity for the laborers, as well as for the safety of our nation’s food supply, and for reducing health and public assistance cost; and

• Pesticide and heat stress prevention training.

Barriers that at times confront farm workers include, but are not limited to, the following:

• Lack of timely, reliable data and information pertinent to intrastate and interstate job openings and supportive services;

• Provider service delivery hours of operation that conflict with MSFWs work schedules;

• Lack of transportation, limiting access to jobs and supportive services;

• Underemployment or unemployment due to limited literacy education, and lack of non-agricultural job experience;

• Limited participation in support programs due to lack of understanding of eligibility and other factors, such as impact on immigration status for having utilized certain services;

• Lack of full-time, year-round work, combined with low wages, that relegates MSFWs to living below the poverty line;

• Competition from undocumented workers who work for less pay and substandard living and working conditions;

• Competition from intrastate and interstate farm labor contractors who follow migrant streams accompanied by their own farm worker crews;

• Limited educational opportunities, including a lack of short-term, skilled-based training offered bilingually, for MSFWs; and

• Limited knowledge of job search techniques for finding employment outside of agriculture.

2. OUTREACH ACTIVITIES

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

The commonwealth projects 40,000 MSFWs for the coming year as estimated by WIA 167 National Farmworker Jobs Program (NFJP) grantees. This number remains static because similar crop activities are anticipated.

In PY 2015, PA CareerLink® centers estimate they will receive approximately 800 agricultural job openings and will refer applicants to approximately 85 percent of them. The offices estimate they will continue to receive approximately 140 clearance orders for the PY 2015 harvest season from other states and anticipate these to be primarily requests for H–2A workers.

A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

Currently, every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the “Agricultural Specialist.” That employee is responsible for liaison with agriculture employers and serving the placement needs of MSFW. Agricultural Specialists will utilize,

when feasible, the Agriculture Recruitment System to recruit and refer qualified MSFW to job openings. The commonwealth is considering reducing the number of staff designated as Agriculture Specialists and concentrating staff efforts to the areas with a high concentration of agriculture employment while ensuring all areas can be covered when needed. The State Monitor Advocate position is housed within L&I Central Office. The position is full-time and monitors outreach activities and the coordination of outreach across the commonwealth.

MSFWs receive a basic summary of their rights when they receive services in the PA CareerLink® center or during outreach. Outreach workers shall explain to MSFWs at their working, living or gathering areas services available from the PA CareerLink®, including the availability of referrals to agricultural and non-agricultural employment, training, supportive services, testing, counseling and other job development services, types of specific employment opportunities available in the PA CareerLink®, information on the agriculture complaint system and information on other organizations, such as PathStone, serving MSFWs. Outreach workers will encourage the MSFW to visit their local PA CareerLink® to access the full range of employment services. In the instance the MSFW cannot or will not visit the local PA CareerLink®, the worker can assist the MSFW in the preparation of applications, assistance in obtaining referral to employment opportunities currently available, as well as information regarding the type of employment opportunities which will become available; assistance in the preparation, receipt and referral of complaints; referral to supportive services; and transportation assistance to appointments at local PA CareerLink® offices or appropriate partners. Tools used to conduct outreach include printed material, flyers, cellular phone, business cards and posters. Printed materials range from business cards, listings of services, provider agencies, worker rights, and topical information on everything from pesticides to heat stress.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE COMPLAINT SYSTEM, INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWS IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

As a component of the collaboration between the Department of Labor & Industry and the Department of Agriculture, including the NJFP grantee, outreach workers will be aware of training, development as well as technical assistance resources available to them. The Foreign Labor Certification (FLC) program is overseen by the Bureau of Workforce Partnership & Operations (BWPO) with a dedicated staff to implement FLC requirements, not including the Agriculture Specialists located in the PA CareerLink® centers. Through the development of a new relationship with the Department of Agriculture and the development of training plans, the BWPO will ensure outreach workers and the Agriculture Specialists clearly understand the technical assistance resources available to them. Specific WIOA services available to MSFW and employers may vary locally, and therefore are catalogued and shared at a local level with area outreach workers.

C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES.

The PA Department of Labor & Industry will incorporate a training plan into the outreach worker activities, to include training requirements such as PA CareerLink® 101 - a two-day in-person classroom training that reviews the foundations of workforce development, including the WIOA core programs and other commonwealth initiatives, or similar workforce foundation training activities that meet the needs of the worker, such as webinars and staff symposiums. Unemployment activities are also under the purview of the Department; Wagner-Peyser staff assigned as Agriculture Specialists in the PA CareerLink® are also trained to directly engage UI claimants in the one-stop with re-employment services and are able to provide assistance to individuals seeking to file and/or appeal UI claims. Agricultural Specialists are trained to understand and offer employment services; accordingly, domestic and MSFW jobseekers and workers are afforded universal access to employment services.

D. PROVIDING STATE MERIT STAFF OUTREACH WORKERS PROFESSIONAL DEVELOPMENT ACTIVITIES TO ENSURE THEY ARE ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS.

In partnership with the Department of Agriculture, the PA Department of Labor and Industry will establish an annual training plan for PA CareerLink® staff serving as Agriculture Specialists and outreach workers. Staff will receive training and development opportunities specific to the agriculture industry and MSFWs.

E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS.

The NFJP grantee in Pennsylvania is Pathstone Corp. Each PathStone office serves as the focal point for outreach and recruitment to remote and less accessible areas of the state. In addition, Pathstone Corp. is a Title I provider and/or PA CareerLink® partner in select locations across the commonwealth. The Department of Labor & Industry plans to outreach to PathStone, in partnership with the Department of Agriculture to identify areas for improvement, opportunities for collaboration and coordination of outreach efforts. As a result of this outreach, an outreach plan will be developed that addresses the needs of the MSFW population and agriculture employers.

3. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM.

Describe the State agency's proposed strategies for:

(A) PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

Services Provided to MSFWs through the PA CareerLink® Delivery System

In the PA CareerLink® office in Adams County, which is deemed a “Significant Bilingual MSFW Office” according to conditions in 20 CFR 651.10, designated staff provides MSFWs with in–depth services including: referrals to agricultural and non–agricultural jobs; information on training and supportive services; testing, counseling and job development services; and an explanation of basic farm worker rights and the complaint system. These services are provided regardless of a MSFW’s ability to communicate in English (see available LEP services in other areas of this plan).

Farmworkers seeking permanent agricultural employment are apprised of opportunities, such as in the dairy industry, which also offer opportunities for advancement. Many companies, particularly in food processing, provide training opportunities for workers to advance to become managers, supervisors and technicians. The system also provides MSFWs the opportunity to file complaints when violations are believed to have been committed. Services provided at PA CareerLink® centers are measured using the indicators of compliance reports as mandated by federal regulation at 20 CFR 653.112.

Other non–significant agricultural offices covered by LEP requirements may have bilingual staff, but they are not necessarily designated as MSFW specialists. As proposed, outreach to MSFW workers and agriculture employers will be coordinated and implemented by the Pennsylvania Department of Labor & Industry and PA CareerLink® staff. Full-time capacity for outreach will occur for the Adams County Office throughout the peak season, which is September through November.

MSFWs receive a basic summary of their rights when they receive services in the PA CareerLink® center or during outreach. Outreach workers shall explain to MSFWs at their working, living or gathering areas services available from the PA CareerLink®, including the availability of referrals to agricultural and non-agricultural employment, training, supportive services, testing, counseling and other job development services, types of specific employment opportunities available in the PA CareerLink®, information on the agriculture complaint system and information on other organizations, such as PathStone, serving MSFWs. Outreach workers will encourage the MSFW to visit their local PA CareerLink® to access the full range of employment services. In the instance the MSFW cannot or will not visit the local PA CareerLink®, the worker can assist the MSFW in the preparation of applications, assistance in obtaining referral to employment opportunities currently available, as well as information regarding the type of employment opportunities which will become available; assistance in the preparation, receipt and referral of complaints; referral to supportive services; and transportation assistance to appointments at local PA CareerLink® offices or appropriate partners. Tools used to conduct outreach include printed material, flyers, cellular phone, business cards and posters. Printed materials range from business cards, listings of services,

provider agencies, worker rights, and topical information on everything from pesticides to heat stress.

Services Provided to Agricultural Employers through the PA CareerLink® System

Pennsylvania growers are offered the full range of PA CareerLink® services. Through the Agricultural Recruitment System (ARS), the PA CareerLink® centers are able to help employers meet their needs for permanent, temporary and/or seasonal labor by placing job postings in CWDS and by marketing openings to job seekers.

In addition to Pennsylvania's high quality business services offered to all employers as outlined throughout the State Plan, agricultural employers are also offered our services when met in person on MSFW outreach, at agricultural meetings, and other business–related events.

Job posting requirements, as specified under federal regulations at 20 CFR 653, and housing standards, as specified at 20 CFR 654 and 29 CFR 1910.142, are complied with in the PA CareerLink® centers. Additional requirements, as outlined in ETA Manual No. 3398, which pertain to requests from employers for employing temporary alien agriculture workers under the H–2A Program, are also followed. Along with these requirements, PA CareerLink® staff conduct Prevailing Wage and Prevailing Practice surveys where there is significant MSFW activity and where there are requests for seasonal or temporary farm workers under the H–2A Program. L&I will consult with the PA Department of Agriculture on survey content and timing to try to obtain the highest response possible.

(B) MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS.

There are a number of points in the system where the employment service complaint system is publicized to MSFWs. Every PA CareerLink® prominently displays an ETA-approved employment service complaint system poster in each local office and satellite or district office. The posters are also made available in retail and service establishments frequented by MSFWs in communities that have a high concentration of farmworkers. PathStone and farm labor contractors that are involved in the recruitment process are another outlet for providing information about the employment service complaint system as mandated by federal regulation at 20 CFR 653.112.

(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

Working together, the PA Department of Labor and Industry, the PA Department of Agriculture and PathStone provide an array of service to MSFWs and agriculture employers and are planning to upgrade those services in the coming year.

Currently, there is an Agriculture Specialist in each of the PA CareerLink® centers in Pennsylvania who is responsible for receiving job postings from employers and posting them on the state labor exchange system. The PA CareerLink® is then tasked with helping employers meet their needs for permanent, temporary, and/or seasonal labor by marketing openings to jobseekers. This process forms the core of the Agriculture Recruitment System function.

This system is complemented by the work of PathStone which conducts a Farmworker Forum comprised of local, regional, and state organizations to engage agriculture employers in supporting services to MSFWs.

Within the existing system, the PA Monitor Advocate offers quality assurance and monitoring of the activities occurring within the system.

Currently, the role of the PA Department of Agriculture (PDA) is primarily limited to inspecting the housing that is offered by agriculture employers to MSFWs. PDA has broad regulatory responsibilities within the agriculture and food industry with nearly half its staff complement involved in field activities. It has extensive contact with agriculture and food employers in these roles. It will serve as a conduit between the employers and the PA CareerLink® centers, promoting the ARS and encouraging employers to use it. PDA will also provide training and technical advice to the Agriculture Specialists in the PA CareerLink® centers as well as liaison activities to farm labor contractors that serve the industry. Strengthening the link to employers will support a demand-driven strategy to improve and increase outreach efforts to MSFW and better align job opportunities with MSFW seeking employment.

4. OTHER REQUIREMENTS

(A) COLLABORATION

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

Currently, the State Monitor Advocate, in partnership with the 167 NFJP grantee, holds an annual MSFW Coordinating Committee meeting and invites all MSFW agencies and groups along with US DOL and the PA Department of Agriculture to attend. These meetings are also open to the public. Working more closely with the PA Department of Agriculture, the PA Department of Labor & Industry expects to increase the number of agriculture employers who are involved in planning related to the utilization of MSFWs. The Department also intends to reach out to farm labor contractors who are important parts of the system and engage them in planning as well.

There also needs to be closer future collaboration with the local representatives of PathStone, the Section 167 National Farmworker Jobs Program grantee for the commonwealth; the PA Department of Agriculture Business Outreach Specialists; and the local PA CareerLink® offices on an ongoing basis. These are the three main components of a local and statewide system that work for agriculture employers and MSFWs alike.

(B) REVIEW AND PUBLIC COMMENT.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review

and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The commonwealth ensured that the WIOA Section 167 NFJP grantee, other appropriate farmworker groups, public agencies, agricultural employer organizations and other interested employer organizations were aware that the State Plan had been posted for public comment. The commonwealth responded to all comments received during the public comment period through an addendum to the final submission of the State Plan.

(C) DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Pennsylvania previously received a waiver from the US DOL to pilot the Common Measures Management System; accordingly, some of the MSFW data elements are no longer captured and the ability to directly compare quantitatively proportionate services of MSFW to non-MSFW is limited. Less than one percent of estimated MSFWs received PA CareerLink® services in the last four years. The Department has recently incorporated the MSFW characteristic for customers receiving labor exchange services and will be able to more accurately report MSFWs receiving services under WIOA. The Department expects MSFW service goals to improve and increase as a result of the partnership with the Department of Agriculture in outreach in staff training.

(D) ASSESSMENT OF PROGRESS

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

PY 2014 MSFW Activity

During PY 2014, there were an estimated 40,000 migrant workers in the commonwealth, with 77 MSFWs registered for services with PA CareerLink®. Since only a small percentage of MSFWs use the PA CareerLink® computerized system, the 77 registered farm workers represent less than one percent of all MSFWs. These numbers are not unique to Pennsylvania or to Federal Region II. One of Pennsylvania's neighboring states listed in its AOP zero (0) as the total number of registered farm workers on their system. While MSFW usage of state one–stop services are constantly low through the entire East coast migrant stream, Pennsylvania welcomes and encourages MSFWs to take full advantage of the wide range of services.

The following list shows estimated numbers of MSFWs involved in the harvest of labor intensive agricultural communities for some of the highest volume crops during PY 2014. Estimates have changed only slightly over the last several years.

Apple/Peach - 4,000 MSFWs - South Central PA

Green Wrap Tomatoes - 150 MSFWs - North Central PA

Mushroom Harvest - 5,000 MSFWs - Southeast PA

Vegetable Harvest - 4,000 MSFWs - South Central & Western PA

Nursery/Landscape/Trees - 150 MSFWs - Western & Central PA

Cut Christmas Trees - 250 Workers - Central & Eastern PA

The difference in numbers between the estimated 40,000 MSFWs in Pennsylvania and the numbers of estimated workers provided in the list above can be attributed to all other crop activities, many of which are too small to have their own category and breakdown. Cherries, strawberries, grapes, raspberries, blueberries, nuts, pears, Asian pears, apricots, pumpkins, sweet corn, potatoes, beets, asparagus, carrots, garlic, and a full range of other crops comprise a large agricultural industry spread out across the state. The 40,000 number of farm workers on the AOP was provided to the commonwealth by the WIOA section 167 grant recipient, PathStone, which collects data and comes up with the total number of MSFWs on an annual basis.

Pennsylvania has received a waiver from the USDOL to pilot the Common Measures Management System. Some of the MSFW data elements are no longer captured. Therefore, to account for those missing elements, data from prior years has been used, factoring in current agricultural trends in the state. Data that continues to be captured reflect the stability and accuracy of the report.

Between July 1, 2014, and June 30, 2015, CWDS listed 80 temporary H–2A agricultural job postings. Seventy–three U.S. workers applied for these jobs in person at PA CareerLink® centers. A considerably larger number of U.S. applicants self–referred for those same jobs, but the exact numbers are not captured. Total numbers are captured by the Chicago National Processing Center. Of the 73 known applicants to these jobs, four U.S. workers were hired. During this same period, PA CareerLink® offices received 7,356 temporary non–agricultural job openings and 47,287 permanent non–agricultural job openings. PA CareerLink® offices placed 5,906 job applicants against the temporary non–agricultural job postings and 32,849 against the permanent non–agricultural job postings.

The 5148 Labor Exchange Agricultural Reporting System (LEARS) statistical activities require little explanation. Although MSFW numbers are low due to extenuating circumstances, Pennsylvania consistently meets or exceeds USDOL–ETA goals. All five “Equity Indicators,” i.e., referrals to jobs, staff assisted services, supportive services, career guidance, and job development contacts were met. That means that in each of the above categories MSFWs received equal or greater service than the general population. With regard to the seven “minimum service level indicators,” which are job placement, placed at $.50 above the minimum wage, placed in long term non–ag job, reviews of significant offices, field checks conducted, outreach contacts per staff day worked, and timely process of ES complaints, all service levels consistently met or surpassed DOLETA goals for the year.

Unlike areas of growth industries, agriculture in Pennsylvania remains robust yet static. Therefore, our goals are set accordingly. From year to year there is practically no change in the numbers of growers, labor camps, and ultimately MSFWs. The same holds true for the H–2A guest worker program. The different numbers of H–2A orders from year to year generally vary by single digits. Thus field checks, field visits, outreach, monitoring, and equity ratio indicators remain constant. During the 2014 growing/harvest season, L&I received a total of 360 agricultural interstate clearance orders for a total of 1,750 farm workers.

(E) STATE MONITOR ADVOCATE

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

Pennsylvania's State Monitor Advocate assisted in the development of the PY 2015 Agricultural Outreach Plan (AOP) section of the Pennsylvania Combined State Plan and approved of its contents.

F. WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3)); Yes

2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; Yes

3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

The State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under Title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The content standards for adult education are currently in full alignment with state-adopted challenging academic contents standards. The Pennsylvania State Board of Education adopted the Pennsylvania Core Standards in November 2013. The standards went into effect March 1, 2014. PDE, Division of Adult Education began formal statewide implementation of the College and Career Readiness Standards for Adult Education (CCRS) during PY 2014–15. Prior to implementation of the CCRS, Division of Adult Education staff completed a crosswalk of the CCRS to the Pennsylvania Core Standards. All items included in the CCRS are also in the Pennsylvania Core Standards; in many cases, the wording of the standards is identical.

PDE, Division of Adult Education is implementing the use of CCRS in Title II programs under a three–year plan. The plan began in PY 2014–15 with the goal of full implementation in PY 2016–17. At that point, the CCRS should serve as the foundation for instruction in all Title II programs, including English language acquisition programs.

B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide the adult education and literacy activities, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
    1. Provides adult education and literacty activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
    2. Is for the purpose of educational and career advancement.

Once all required conditions are in place, PDE will conduct a full and open competition for new grants to be awarded July 1, 2017. The grant application will address, at a minimum, the thirteen considerations and seven requirements established in Title II. The competition will be open to all eligible providers. All eligible providers will be required to submit evidence of demonstrated effectiveness. To demonstrate effectiveness, applicants that have received Title II AEFLA funds and/or state matching funds through PDE Division of Adult Education in the program years immediately preceding the competition will be evaluated based on their performance against the state's negotiated targets during those years. Applicants that did not receive funds through the Division of Adult Education will be required to provide data that show their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their academic skills, achieve high school equivalency, and transition into employment and/or postsecondary education/training. The competition will be conducted through PDE's eGrants system. As part of the application process, applicants will be required to submit their applications to the LWDB, which will review the applications for alignment with the local plan. PDE will provide opportunity to the local boards to provide recommendations and will take the recommendations and results of the review into consideration when scoring the related sections of the applications.

PDE anticipates a four-year grant period with yearly grant contracts. Each year's renewal will be based on evidence of success in provision of the contracted services and subject to the availability of funds. All funds will be used in compliance with the supplement not supplant stipulation of the law.

Prior to the competition, PDE will use a needs-based funding formula to distribute funds to the local workforce areas. The funding formula was developed in 2010 by PDE and a group of adult basic education program administrators under a technical assistance activity provided by US Department of Education. In local workforce development areas consisting of multiple counties, PDE anticipates further breaking out funding by county to ensure services are available throughout the local area.

All adult education programs funded under Section 231 and state matching funds will be required to be full-service adult education programs. They must provide instruction at all six adult basic education (ABE) and adult secondary education (ASE) educational functioning levels (EFL), plus English language acquisition (ELA) activities and integrated English literacy and civics (IEL/Civics) education where there is a need. Programs providing ELA and/or IEL/Civics services must support transition of those students to ABE/ASE instruction. All programs must use a portion of their state funds to support a tutoring program that offers one-on-one and/or small group instruction or volunteer classroom aides. Programs must also prepare students for and support them in achieving successful transition to postsecondary education/training or employment. Family literacy activities will be supported with state funds.

Programs will integrate digital literacy, employability skills and workforce preparation activities into services. Basic skills instruction will incorporate activities that require the use of technology, promote critical thinking, and build self-management skills, such as utilizing resources and information, understanding systems, and working with others. Programs will have an intake and orientation process that helps students and staff determine an individual's readiness for participation in the program. This includes activities to help the individual assess his/her own schedule and potential barriers to successful participation in instruction. It also includes a discussion of the individual's reasons and goals for participation. Programs must have attendance and other policies that are consistently enforced to help students develop the self-management skills to persist in services, with the goal that those skills will transfer to employment situations. All programs will integrate career awareness and career planning activities into the services provided to students, including using

those activities as the context for basic skills instruction. Programs must have at least one case manager who works with students to address barriers to participation and to plan and prepare for transition to postsecondary education and/or training. Case management activities in support of transition will be offered in a variety of ways: integrated into instruction, stand-alone group activities, and one-on-one case management support. The activities will include introducing students to and helping them use the resources available through L&I and the PA CareerLink®; helping students identify employment and career pathways that align with their skills and interests and also lead to jobs that pay; and supporting students through the application process for employment or training. Case managers will help students identify and address potential barriers to successful transition, such as child care, transportation, and funding to pay for training, among others. Case managers will work closely with staff at the local PA CareerLink® and refer students to PA CareerLink® career services as appropriate. Case managers will also coordinate with TANF or Title I or Title IV career counselors to support co-enrollment.

When and where appropriate, programs will be encouraged to develop integrated education and training that provides adult education and literacy activities, concurrently and contextually with both workforce preparation activities and workforce training for a specific occupation or occupational cluster, and that is for the purpose of educational and career advancement. Integrated education and training programs will support the needs of the local labor market and will be developed in consultation with LWDBs, employers, and training providers. The occupational training provided as part of an integrated education and training program will be connected to realistic, existing employment opportunities in the local area and provide an “on ramp” to a career pathway for the participants. The commonwealth will develop policy and guidance further clarifying allowable and required activities in an integrated education and training program. In addition, the commonwealth will research funding opportunities to cover the costs of the occupational training whenever possible.

SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of Title II, subtitle C, any of the following academic programs for:

a. Adult education and literacy activities;
b. Special education, as determined by the eligible agency;
c. Secondary school credit;
d. Integrated education and training;

e. Career pathways;
f. Concurrent enrollment;
g. Peer tutoring; and
h. Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

PDE, Division of Adult Education will compete funds for services under Section 225 as part of the overall application for Section 231 funds. Eligible providers submitting applications under Section 231 will have the option to include corrections education under Section 225 as part of the services to be provided. Thus, Section 225 funds will be included in the multi–year grants for Title II direct service funds where there is a local need. All aspects of the grant competition as described in sections III.b.5.B.i and ii and Title II Local Activities of the state plan apply to Section 225 funds. The competition will be open to all eligible providers. PDE has policies and procedures in place to ensure that the same grant announcement is made available to all eligible providers. Options for publication of grant announcement(s) include the Pennsylvania Bulletin and Penn*Link. Information will also be posted to the PDE website, which is accessible to the public. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for funds, including Section 225 funds. The applications in which Section 225 funds are included will address the seven requirements and thirteen considerations. All applications will be reviewed by teams of three using the same rubric and scoring criteria. The rubric will include special consideration to eligible providers that prioritize corrections education services to individuals who are likely to leave the correctional institution within five years of participation in the program. As appropriate, PDE will include individuals with knowledge of corrections education on application review teams.

Through the competition, PDE will ensure that there is at least one eligible provider offering corrections education services in the state. Entities funded to provide corrections education will provide at least one of the allowable activities listed in section 225 and will be required to ensure that priority of service is given to those individuals who are likely to leave the correctional institution within five years of participation in the program. PDE will work with representatives from the PA Department of Corrections and other education stakeholders to identify best practices to support the requirements of Section 225 of Title II and use the information to inform development of the related section of the grant application.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

1. DESCRIBE HOW THE STATE WILL ESTABLISH AND OPERATE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAMS UNDER SECTION 243 OF WIOA, FOR ENGLISH LANGUAGE LEARNERS WHO ARE ADULTS, INCLUDING PROFESSIONALS WITH DEGREES AND CREDENTIALS IN THEIR NATIVE COUNTRIES.

PDE will hold a separate competition for funds under Section 243 of WIOA for IEL/Civics with integrated education and training activities, which will be open to all eligible providers. Grant applications will be submitted through PDE's eGrants system. The content of the grant application will address the seven requirements and thirteen considerations identified in the Act. As part of the application, all eligible providers will be required to submit evidence of demonstrated effectiveness. To demonstrate effectiveness, applicants that have received Title II AEFLA funds and/or state matching funds through PDE Division of Adult Education in the program years immediately preceding the competition will be evaluated based on their performance against the state's negotiated targets during those years. Applicants that did not receive funds through the Division of Adult Education will be required to provide data that show their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their English language skills, achieve high school equivalency, and transition into employment and/or postsecondary education/training. While all of these measures will be considered as evidence of demonstrated effectiveness, demonstrated effectiveness in improving English language skills of English language learners will be given the greatest weight.

In addition to addressing the seven requirements and thirteen considerations identified in the Act, applicants for IEL/Civics funds under Section 243 will be required to provide extensive data to demonstrate the need for and potential for success of IEL/Civics activities in conjunction with integrated education and training in the proposed service area. Such data will include, but not be limited to, immigration trends, demographics of the English language learners in the area where the program will be provided and employment and labor market statistics for the area. In addition, applicants will need to provide evidence that they have developed or will be able to develop in a timely fashion, partnerships that support the purpose of the program. Applicants will also need to provide evidence of communication with and input from social service organizations serving the target population, the LWDB, and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program. Applicants will provide evidence that such occupational training is in in-demand industries and has the potential to lead to economic self-sufficiency. Applicants will be required to provide assurances that the occupational training included as part of the program will be provided by qualified providers.

As part of the application process, applicants for Section 243 IEL/Civics will be required to submit their applications to the LWDB, which will review the applications for alignment with the local plan. PDE will provide opportunity to the local boards to provide recommendations and will take the recommendations and results of the review into consideration when scoring the related sections of the applications.

For the initial competition, PDE anticipates a two-year grant period with yearly grant contracts. Renewal of the grant for the second year will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in helping students improve English language skills; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the

availability of funds determined by the amount of the federal award. Funds awarded under Section 243 of WIOA will be used, at a minimum, to support IEL/Civics programing, including instruction on the rights and responsibilities of citizenship and civic participation; adult literacy and education activities; and workplace preparation activities of the programs. Applicants will be encouraged to identify alternative funding opportunities to cover the costs of the occupational training portion of the integrated education and training program; however, use of Section 243 funds for such training will be allowable. PDE does not anticipate mandating a specific model for all programs that receive Section 243 funds to provide IEL/Civics with integrated education and training. Applicants will propose a model that ensures provision of all required components in compliance with WIOA regulations. In cases in which the grant recipient does not provide all components itself, it will be responsible for ensuring full integration of all activities.

Toward the end of the second year of the grant period, PDE will hold another competition for Section 243 funds. The details of that competition will be determined at a later date and will be informed by the results of the programing at the agencies that receive Section 243 funds in the initial competition; PDE will ensure that the competition meets all the requirements of a competition identified in the Act.

PDE has policies and procedures in place to ensure that the same grant announcement for Section 243 funds is made available to all eligible providers. Options for publication of grant announcement(s) include the Pennsylvania Bulletin and Penn*Link. Information will also be posted to the PDE website, which is accessible to the public. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for IEL/Civics funds under Section 243.

PDE has guidelines in place to ensure a fair and open competition. In accordance with these guidelines, grant applications will be evaluated by teams of three individuals. Team members will include staff from the Division of Adult Education, other PDE staff, other qualified commonwealth staff, and, as needed, peer reviewers, subject matter experts, and/or consultants. Division staff will create a scoring rubric specific to the Section 243 IEL/Civics grant application, which will address all items in the grant application including demonstrated effectiveness and the results of the local board reviews with recommendations. Review team members will be trained prior to beginning evaluation and scoring of applications. Once the applications have been reviewed and scored, they will be ranked from highest to lowest scoring. PDE will award grants to the highest scoring applicant and will continue to award funds until the total amount available for grants has been awarded.

The commonwealth encourages Title II providers to pursue innovative IEL/Civics programs regardless of whether providers receive the grants described above. Although external funding is desirable, the absence of such funding should not prevent providers from establishing these programs.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION SERVICES AND HOW THE FUNDS WILL BE USED FOR THOSE SERVICES.

PDE will hold a separate competition for funds under Section 243 of WIOA for IEL/Civics with integrated education and training activities, which will be open to all eligible providers. Grant applications will be submitted through PDE’s eGrants system. The content of the grant application will address the seven requirements and thirteen considerations identified in the Act. As part of the application, all eligible providers will be required to submit evidence of demonstrated effectiveness.

To demonstrate effectiveness, applicants that have received Title II AEFLA funds and/or state matching funds through PDE Division of Adult Education in the program years immediately preceding the competition will be evaluated based on their performance against the state's negotiated targets during those years. Applicants that did not receive funds through the Division of Adult Education will be required to provide data that show their past ability to achieve success in comparable measures. For both groups, these measures include effectiveness in helping students develop their English language skills, achieve high school equivalency, and transition into employment and/or postsecondary education/training. While all of these measures will be considered as evidence of demonstrated effectiveness, demonstrated effectiveness in improving English language skills of English language learners will be given the greatest weight.

In addition to addressing the seven requirements and thirteen considerations identified in the Act, applicants for IEL/Civics funds under Section 243 will be required to provide extensive data to demonstrate the need for and potential for success of IEL/Civics activities in conjunction with integrated education and training in the proposed service area. Such data will include, but not be limited to, immigration trends, demographics of the English language learners in the area where the program will be provided and employment and labor market statistics for the area. In addition, applicants will need to provide evidence that they have developed or will be able to develop in a timely fashion, partnerships that support the purpose of the program. Applicants will also need to provide evidence of communication with and input from social service organizations serving the target population, the LWDB, and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program. Applicants will provide evidence that such occupational training is in in-demand industries and has the potential to lead to economic self-sufficiency. Applicants will be required to provide assurances that the occupational training included as part of the program will be provided by qualified providers.

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For the initial competition, PDE anticipates a two-year grant period with yearly grant contracts. Renewal of the grant for the second year will be based on the following criteria: contract compliance, including success in meeting contracted enrollment and providing the contracted services; evidence of sufficient progress in helping students improve English language skills; evidence of continuous program improvement; compliance with fiscal and programmatic policies and guidelines; and the availability of funds determined by the amount of the federal award. Funds awarded under Section 243 of WIOA will be used, at a minimum, to support IEL/Civics programing, including instruction on the rights and responsibilities of citizenship and civic participation; adult literacy and education activities; and workplace preparation activities of the programs. Applicants will be encouraged to identify alternative funding opportunities to cover the costs of the occupational training portion of the integrated education and training program; however, use of Section 243 funds for such training will be allowable. PDE does not anticipate mandating a specific model for all programs that receive Section 243 funds to provide IEL/Civics with integrated education and training. Applicants will propose a model that ensures provision of all required components in compliance with WIOA regulations. In cases in which the grant recipient does not provide all components itself, it will be responsible for ensuring full integration of all activities.

Toward the end of the second year of the grant period, PDE will hold another competition for Section 243 funds. The details of that competition will be determined at a later date and will be informed by the results of the programing at the agencies that receive Section 243 funds in the initial competition; PDE will ensure that the competition meets all the requirements of a competition identified in the Act.

PDE has policies and procedures in place to ensure that the same grant announcement for Section 243 funds is made available to all eligible providers. Options for publication of grant announcement(s) include the Pennsylvania Bulletin and Penn*Link. Information will also be posted to the PDE website, which is accessible to the public. PDE will conduct the grant competition through its eGrants system. Through this system all eligible providers have access to the same grant application for IEL/Civics funds under Section 243.

PDE has guidelines in place to ensure a fair and open competition. In accordance with these guidelines, grant applications will be evaluated by teams of three individuals. Team members will include staff from the Division of Adult Education, other PDE staff, other qualified commonwealth staff, and, as needed, peer reviewers, subject matter experts, and/or consultants. Division staff will create a scoring rubric specific to the Section 243 IEL/Civics grant application, which will address all items in the grant application including demonstrated effectiveness and the results of the local board reviews with recommendations. Review team members will be trained prior to beginning evaluation and scoring of applications. Once the applications have been reviewed and scored, they will be ranked from highest to lowest scoring. PDE will award grants to the highest scoring applicant and will continue to award funds until the total amount available for grants has been awarded.

The commonwealth encourages Title II providers to pursue innovative IEL/Civics programs regardless of whether providers receive the grants described above. Although external funding is desirable, the absence of such funding should not prevent providers from establishing these programs.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA.

The overarching goal of PDE's investment of state leadership funds is to support a system of professional development and technical assistance to ensure a high–quality adult basic education system that aligns with the goals of the state, regional and local workforce development plans to meet the needs of workers and employers in the commonwealth. The system emphasizes program improvement based on data and high–quality research–based technical assistance and professional development opportunities that promote such program improvement. PDE will also use some of its state allocated funds to support state leadership priorities established in state law.

PDE intends to fund one or more activities that provide technical assistance and support to Title II programs to be effective partners in the workforce development system. Such work will focus on the required activities: 1) align adult literacy activities with other core programs and with one–stop partners, as appropriate, to implement strategies in the state plan; 2) participation in the development of career pathways that provide access to employment and training for individuals in adult education programs; 3) understanding and fulfilling Title II's role as a one–stop partner to provide access to employment, education and training services. These activities will also support permissible activities such as developing content and models for integrated education and training

and career pathways; and promoting linkages with employers to promote workplace adult education and literacy activities and integration of adult education and literacy activities into occupational training.

PDE intends to fund one or more activities to support the use of technology. PDE will continue to support the use of technology to disseminate information about models and promising practices for instruction, staff development and program improvement; instructional and programmatic practices based on rigorous and scientifically valid research; and other information relevant to high–quality adult education and literacy services. PDE will also fund a project to provide technical assistance to eligible providers on the use of technology to improve system efficiencies and provide staff training, as well as on the integration of technology into instruction to promote learning and digital literacy.

PDE intends to fund several activities that, together, comprise a high quality professional development system that identifies and provides training in the following: instruction in areas such as reading, writing, speaking, mathematics and English language acquisition; use of data for program monitoring and evaluation for continuous program improvement; training for volunteer instructors; and development of lesson plans, resources and curricula that align with the CCRS.

PDE will ensure that procurement of both required and permissible state leadership activities is in compliance with state procurement policy. PDE anticipates using a combination of contractual tools, including both grants and purchase of services.

The quality of Pennsylvania's state leadership and professional development activities will be assessed using both formal and informal methods of evaluation. These evaluations will be completed by participants in the activities, by the providers of professional development and technical assistance [referred to collectively as the professional development system (PDS)], and by PDE staff. The goal of evaluation is to support continuous improvement of these professional development activities and to improve instructional practices.

Local program staff will evaluate and provide feedback through several means. Participants will complete evaluations at the end of every formal professional learning opportunity. The evaluations will follow a standard format that includes questions about participant satisfaction and impact on practice, as well as open-ended questions seeking suggestions for improvement. Local program staff across the state will be invited to participate in the annual formal needs assessment conducted by the PDS. In addition to these formal methods, local program staff will provide feedback via their interactions with the PDS during the consultant meetings held at individual agencies and in the monthly Agency Professional Development Team Webinars. While the main purpose of these meetings is to support the programs' progress in implementing skills and knowledge from professional development and assist agencies in completing improvement at their programs, the discussions also help the PDS and PDE to determine if the professional development and technical assistance activities are helping to improve the use of new knowledge and skills by instructors and are positively impacting student outcomes.

In addition to input from local program staff, PDE has several tools available to directly evaluate the work of the projects funded to provide professional development and technical assistance activities. All projects will submit quarterly and final reports, which will provide evidence of progress toward and achievement of the goals specified in their grant narratives. Evidence will include both quantitative and qualitative data. Additionally, each project will write a program improvement/professional development plan similar to that required of local programs. In the first grant year, each project will identify professional development activities for project staff that support the goals and objectives of

the project. In subsequent grant years, each project will examine its prior year quarterly and final reports and submit an improvement plan that includes areas of focus and a description of the professional development in which project staff will participate to meet their program improvement goals. At the end of each year, the projects will submit to PDE an evaluation with appropriate documentation of whether they met their goals for the year. PDE staff will also use its weekly meetings with the leaders of each funded project to monitor and evaluate work.

From PYs 2012-13 through 2014-15, an outside consultant conducted a formal external evaluation of the PDS. The evaluation was framed using Thomas Guskey's "Five Levels of Professional Development Evaluation," and each year's findings and recommendations were used to inform the next year's PDS activities. To build on that evaluation, PDE is examining three options. The first is an internal evaluation using a logic model approach. In PY 2016-17, PDE and PDS staff will develop a logic model to evaluate leadership project effectiveness and pilot it with one project. If it is useful, PDE will expand its use to all PDS projects in PY 2017-18. The second option is a project focused on data collection and evaluation of the effectiveness of professional learning opportunities. This work would be conducted by an entity that had no role in the provision of professional development and technical assistance to the field other than assistance with data collection. The third option is another traditional external evaluation.

2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE.

The overarching goal of PDE's investment of state leadership funds is to support a system of professional development and technical assistance to ensure a high–quality adult basic education system that aligns with the goals of the state, regional and local workforce development plans to meet the needs of workers and employers in the commonwealth. The system emphasizes program improvement based on data and high–quality research–based technical assistance and professional development opportunities that promote such program improvement. PDE will also use some of its state allocated funds to support state leadership priorities established in state law.

PDE intends to fund one or more activities that provide technical assistance and support to Title II programs to be effective partners in the workforce development system. Such work will focus on the required activities: 1) align adult literacy activities with other core programs and with one–stop partners, as appropriate, to implement strategies in the state plan; 2) participation in the development of career pathways that provide access to employment and training for individuals in adult education programs; 3) understanding and fulfilling Title II's role as a one–stop partner to provide access to employment, education and training services. These activities will also support permissible activities such as developing content and models for integrated education and training and career pathways; and promoting linkages with employers to promote workplace adult education and literacy activities and integration of adult education and literacy activities into occupational training.

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PDE intends to fund several activities that, together, comprise a high quality professional development system that identifies and provides training in the following: instruction in areas such as reading, writing, speaking, mathematics and English language acquisition; use of data for program monitoring and evaluation for continuous program improvement; training for volunteer instructors; and development of lesson plans, resources and curricula that align with the CCRS.

PDE will ensure that procurement of both required and permissible state leadership activities is in compliance with state procurement policy. PDE anticipates using a combination of contractual tools, including both grants and purchase of services.

The quality of Pennsylvania's state leadership and professional development activities will be assessed using both formal and informal methods of evaluation. These evaluations will be completed by participants in the activities, by the providers of professional development and technical assistance [referred to collectively as the professional development system (PDS)], and by PDE staff. The goal of evaluation is to support continuous improvement of these professional development activities and to improve instructional practices.

Local program staff will evaluate and provide feedback through several means. Participants will complete evaluations at the end of every formal professional learning opportunity. The evaluations will follow a standard format that includes questions about participant satisfaction and impact on practice, as well as open-ended questions seeking suggestions for improvement. Local program staff across the state will be invited to participate in the annual formal needs assessment conducted by the PDS. In addition to these formal methods, local program staff will provide feedback via their interactions with the PDS during the consultant meetings held at individual agencies and in the monthly Agency Professional Development Team Webinars. While the main purpose of these meetings is to support the programs' progress in implementing skills and knowledge from professional development and assist agencies in completing improvement at their programs, the discussions also help the PDS and PDE to determine if the professional development and technical assistance activities are helping to improve the use of new knowledge and skills by instructors and are positively impacting student outcomes.

In addition to input from local program staff, PDE has several tools available to directly evaluate the work of the projects funded to provide professional development and technical assistance activities. All projects will submit quarterly and final reports, which will provide evidence of progress toward and achievement of the goals specified in their grant narratives. Evidence will include both quantitative and qualitative data. Additionally, each project will write a program improvement/professional development plan similar to that required of local programs. In the first grant year, each project will identify professional development activities for project staff that support the goals and objectives of the project. In subsequent grant years, each project will examine its prior year quarterly and final reports and submit an improvement plan that includes areas of focus and a description of the professional development in which project staff will participate to meet their program improvement goals. At the end of each year, the projects will submit to PDE an evaluation with appropriate documentation of whether they met their goals for the year. PDE staff will also use its weekly meetings with the leaders of each funded project to monitor and evaluate work.

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a logic model to evaluate leadership project effectiveness and pilot it with one project. If it is useful, PDE will expand its use to all PDS projects in PY 2017-18. The second option is a project focused on data collection and evaluation of the effectiveness of professional learning opportunities. This work would be conducted by an entity that had no role in the provision of professional development and technical assistance to the field other than assistance with data collection. The third option is another traditional external evaluation.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

PDE, Division of Adult Education will apply the performance targets established in the state plan to the local programs for monitoring, assessment, and evaluation purposes. Further, the Division of Adult Education will apply an additional performance measure: the number of outcomes achieved per student; the outcomes are those addressed in the performance measures: employment in the second and fourth quarters after exit, attainment of a secondary or postsecondary credential, and demonstration of a measureable skill gain. The numerator for this performance measure is the unduplicated number of successful outcomes an agency has for all of its enrolled students. The denominator is the unduplicated number of enrolled students in the agency.

The Division of Adult Education will conduct formal ongoing monitoring, assessment, and evaluation of local programs through both desk monitoring and onsite monitoring visits. Regional advisors will keep track of agency progress toward key markers of performance, such as contracted enrollment, appropriate assessment, employment outcomes and student persistence, using a range of tools. When data show areas for concern, advisors will contact the local program administrators to discuss the concerns and provide guidance and technical assistance. After the end of the program year, advisors will contact each agency individually to discuss its performance, focusing on areas in which the program has shown progress and areas in which it must improve.

In addition to this ongoing desk monitoring, division staff will conduct comprehensive, onsite monitoring visits. The division will use a risk rubric, applied annually, to determine which agencies to monitor. Agencies with the highest scores will be selected for onsite monitoring visits. These visits will be conducted by teams of two, four or six people. Each visit will be guided by a monitoring tool to ensure standardization of the visits. Monitoring visits will include an initial meeting with the administrator of the adult education program; class visits; a student focus group; a staff focus group; a review of data and student records; program compliance review; fiscal review; and a meeting at the end of the visit for the presentation of commendations, findings with required actions, and recommendations.

After the monitoring visit, the division will send a written monitoring report to the agency explaining all of the commendations, findings with required actions, and recommendations. The agency will submit a corrective action plan (CAP), which must address all findings with required actions, at a minimum. Agencies will be strongly encouraged to address recommendations as well. The regional advisors will be available to provide technical assistance during the development of the CAP and during implementation of the approved actions for correction and improvement. In addition, programs will be referred to the services of state leadership-sponsored activities where appropriate. The program will be required to provide updates on progress and documentation/evidence of

completed actions. When necessary, the regional advisor will conduct a follow up visit approximately six months after the CAP is submitted.

The state office will also conduct ongoing informal evaluation for the purpose of technical assistance and continuous program improvement. Initial focus will be on three areas: 1) students who had sufficient attendance hours to be post-tested but were not; 2) students who completed intake, orientation, and initial assessment but did not reach enrollment status (i.e. 12 hours of instruction); and 3) students who reached enrollment status but did not stay long enough to be post-tested within the appropriate timeframe. Other topics will be determined based on the results of future assessment and evaluation.

Local programs will also be supported by state office staff and state leadership activities to engage in required, ongoing self-monitoring, assessment and evaluation. Each program year, they will be required to develop a program improvement/professional development plan based on data and aligned with state office goals. They will be provided with tools similar to those used by the state office staff to track their own progress toward key markers of performance.

CERTIFICATIONS

States must provide written and signed certifications that

1. The plan is submitted by the State agency that is eligible to submit the plan. Yes

2. The State agency has authority under State law to perform the functions of the State under the program. Yes

3. The State legally may carry out each provision of the plan. Yes

4. All provisions of the plan are consistent with State law. Yes

5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. Yes

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan. Yes

7. The agency that is submitting the plan has adopted or otherwise formally approved the plan. Yes

8. The plan is the basis for State operation and administration of the program. Yes

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant's Organization **Pennsylvania Department of Education**

Full Name of Authorized Representative: **Mr. Pedro A Rivera**

Title of Authorized Representative: **Secretary of Education**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

ASSURANCES

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes

2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

_____

* Sec. 102(b)(D)(iii) of WIOA

A. INPUT OF STATE REHABILITATION COUNCIL

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The following documents were used to develop these recommendations to OVR:

1. The Pennsylvania Rehabilitation Council's (PaRC's) annual report (FFY 2014)

2. PaRC Customer Satisfaction Survey

3. Review of items in last year's Attachment 4.2(c)

4. Comments received at 2014 State Plan Meetings

5. Rehabilitation Services Administration (RSA) Monitoring Report

6. Statewide Needs Assessment

7. Workforce Development Statistics

Commendations:

• PaRC commends the leadership of OVR for their partnership with PaRC in regard to policy development and review and Council representation on workgroups.

• PaRC praises OVR leadership for encouraging and supporting stakeholder input such as their involvement in the Pennsylvania Disability Employment & Empowerment Summit (PADES) and Transition conferences, and the customer satisfaction advisory committee.

1. Transition Issue: Support for students between ages 14 to 21 is critical to creating an expectation for employment after school is finished.

Recommendations: a. Work with Youth Leadership Network and Youth Workforce Investment Boards (WIB)

OVR Response: OVR continues to work with the Pennsylvania Youth Leadership Network (PYLN) through the Pennsylvania Community on Transition State Leadership Team. OVR is part of a subcommittee working on Youth Engagement led by members of the PYLN. Together, we are exploring new ways to reach out to local WDB Youth Councils and to increase participation of our youth with disabilities throughout the state in these organizations.

b. Continue relationships established with the Department of Human Services (and the office of Developmental Programs), and Department of Education

OVR Response: OVR is represented on the PA Developmental Disabilities Council, the Governor's Special Education Advisory Panel and the Employment First State Leadership Mentoring Project, all of which are comprised of representatives from partnering agencies.

OVR continues to be a lead member of the Pennsylvania Community on Transition Statewide Leadership Team (SLT). OVR has presented on various employment topics for the SLT's monthly webinar series this year and will continue to do so in the upcoming year. OVR is a member of the Renew Advisory Board through the Department of Education. This program works with the schools to assist youth who are at risk for dropping out.

OVR continues to work with the PA Department of Human Services, Office of Developmental Programs, the Bureau of Autism Services, the Office of Mental Health and Substance Abuse, and the Office of Long Term Living. OVR has reached out to the Department of Health, Bureau of Children, Youth and Family Services to spread awareness of both agency's initiatives and services. OVR is also working with the Bureau of Juvenile Justice in understanding the services needed by adjudicated youth and in assisting our district offices in learning more about this population and how to best determine and provide appropriate services to them. OVR maintains contact with the agencies through monthly or quarterly phone calls. OVR also participates on Advisory Boards and Committees when invited by our collaborating partners. OVR has served on the Department of Health's Traumatic Injury Advisory Board for over 10 years.

c. Continue evaluating Early Reach program for effectiveness

OVR Response: OVR is collecting Early Reach data. The expectation is that the numerical and student data collected early (beginning at age 14) will facilitate and streamline the application and eligibility process for youth with disabilities. This plan may take a few years to implement, but it is in the discussion stage. The criteria to measure the effectiveness of the Early Reach Initiative are still being determined. One method will include OVR better identifying how youth with disabilities first learned about OVR and how they were formally referred for services. In addition, there are requirements for data collection and services to youth and students with disabilities included in WIOA amendments to the Rehabilitation Act.

2. Training for OVR staff and Counselors of Consumer Customers Issue: Important that the public face of OVR is one that is understanding and helping individuals to achieve employment goals.

Recommendations: a. Continue working on improving Consumer Customer satisfaction.

OVR Response: OVR has been committed to providing at least one general customer service video conference training each year. We will continue to develop and offer at least one customer service related video conference session in 2016.

b. Work towards implementation of recommendations from “Defining Positive Customer Service in the State Vocational Rehabilitation System" report.

OVR Response: OVR will continue to collaborate with the PaRC to implement recommendations from Defining Positive Customer Service in the State Vocational Rehabilitation System. We have mutually decided to develop a subcommittee, made up of PaRC and OVR participants who will further evaluate necessary changes as a result of this report. We are confident the recommendations contained in the report will assist us in providing more effective and efficient customer service. OVR commends the PaRC for initiating this project which resulted in true collaboration and will positively impact service provision in the future.

3. CACs (Citizen Advisory Committees) Issue: The CACs are the connection between OVR and Consumer Customers. Each district has their own process for the meetings and for notification about the meetings.

Recommendations: a. OVR to take a more active role in the guidance and development of the CACs.

OVR Response: Development and guidance of CACs can be added to the agenda at an Executive Director’s meeting for discussion. However, the intent of the CAC is to be locally–run, consumer–driven and responsive to CAC member recommendations. OVR will promote CAC meetings as opportunities present themselves.

b. OVR to issue a memo to District Administrators on expectations on utilizing and promoting CACs and citizen involvement (for example including a calendar of PaRC meeting schedule and request to not schedule local meetings at the same time).

OVR Response: OVR Bureau Directors will work with the new Executive Director to develop expectations for how CACs can best be utilized.

c. OVR to gather best practices from the CACs that are effective and well attended by consumer customers and share with all CACs

OVR Response: Sharing of District Office CAC best practices can be added as an agenda item at an Executive Director’s Meeting, at Regional DA/ADA Meetings and during DA/ADA Conference Calls for discussion.

d. Continue to advise CACs on use of PaRC’s website for agendas and minutes

OVR Response: OVR liaison to PaRC sends monthly reminders to district offices and forwards updated information to PaRC for posting on their website.

4. Information Sharing Issue: It is important to get information to consumer customer quickly and in a manner they can access. This will allow greater involvement and lead to a positive customer experience.

Recommendations: a. Use current technology to get word out.

OVR Response: OVR has already connected with 340 followers on LinkedIn and 580 on Facebook as part of our agency's social media initiative, which was launched in October 2013. OVR has been delivering content on a more frequent basis since the platforms became available. Information is gathered from local district offices, statewide events and national sources. Social media posts have highlighted OVR–sponsored activities and events, agency accomplishments, customer success stories and other information pertinent to our consumer and business customers. OVR will increase and refine our social media presence moving forward, with a continued emphasis on delivering quality content and relevant information to all of our customers in a timely manner. OVR will continue to evolve with the changing social media landscape and adapt our strategies as necessary in order to ensure that the material we provide is accessible and impactful.

b. Make sure all communication is accessible.

OVR Response: In collaboration with the L&I Press Office, the Business Services and Outreach Division Chief and Communications Administrative Officer (position to be filled) will review accessible formats for all OVR web information to ensure that current brochures and publications can be provided in large print, Braille, read by using text to speech technologies, or other accessible formats as needed to ensure effective communication as required under the Americans with Disabilities Act. Additionally, communication materials can be tested for accessibility, and recommendations can be made by OVR's Assistive Technology Specialist.

c. Make sure captioning is available in all public meetings OVR holds.

OVR Response: All district offices ensure that captioning and/or signing is available at state plan public meetings.

d. Review lead times for dissemination of information to make sure it is far enough ahead.

OVR Response: OVR will strive to provide information at least two weeks prior to meetings.

5. Partnership with PaRC Issue: PaRC and OVR have mutually benefited from a collaborative relationship as the advisory body in reviewing policies and priorities.

Recommendations: a. Continue involvement in OVR leadership with Council.

OVR Response: OVR will continue to partner with the Council as opportunities present themselves for mutual benefit and input. Specifically, we will be collaborating with PaRC on the results of the Comprehensive Statewide Needs Assessment (CSNA) and future planning based upon those findings. OVR will also have a presence on PaRC committees as needed. In addition, we will be requesting additional input on the ongoing development of the OVR/PaRC combined customer satisfaction survey process.

b. Continue seeking involvement in policy review and implementation.

OVR Response: OVR involves Council members in policy workgroups. We provide subsequent drafts of new and revised policies to the PaRC Policy Committee. The workgroup leader also presents the draft to the PaRC at their full Council meetings to explain the policy and answer any questions.

6. OVR Staff and Counselors as Role Models Issue: People with disabilities need to see Counselors and Management and staff of OVR that have disabilities. This is a benefit to both Consumer and Business Customer to see the possibilities of people with disabilities.

Recommendations: a. Continue and increase outreach to people with disabilities and cultural minorities in Counselor and leadership roles within OVR.

OVR Response: Through collaborative initiatives with higher education institutions, OVR will continue to expand recruitment and outreach to students with disabilities for entry–level VR Counselor positions. Collaboration with universities on federal RSA grant applications that seek to provide scholarship opportunities for students with disabilities will further this initiative. This includes supporting the efforts of university programs to apply for and implement Long Term Training Grant programs to train VR Counselors to work for the public VR program in Pennsylvania. In addition, OVR will continue the following activities as part of its overall VR Counselor recruitment initiative:

• Expand and maintain OVR's partnership with Historically Black Colleges and Universities (HBCU's) that offer a Master's Degree Rehabilitation Counseling Program. This includes campus visitations, presentations, use of telecommunication technology and meetings with students for targeted recruitment.

• Maintain active membership with the National Association of Multicultural Rehabilitation Concerns (NAMRC) and the National Council on Rehabilitation Education (NCRE).

• Visit colleges, universities, and appropriate job fairs in conjunction with the Office of Equal Opportunity in L&I in order to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

b. Review data (such as what is found in Attachment 4.10) to see if numbers are increasing.

OVR Response: Voluntarily disclosed data related to OVR counselors, management and staff that have disabilities shall be compiled, reviewed, and reported on in 6–month intervals. Results will reveal whether or not the number of OVR counselors, management and staff with disabilities has increased or decreased versus the previous 6–month period.

2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND

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3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.

OVR did not reject any of PaRC's input or recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED IN ACCORDANCE WITH THE WAIVER REQUEST;

OVR entered into an Interagency Agreement with Berks Career and Technology Center (BCTC) effective 10/1/14 to provide school–to–work transition services to OVR eligible youth with disabilities who are enrolled in approved training programs at the BCTC and attend one of 16 public school districts within Berks County.

The interagency agreement, named “Work Partners,” provides for joint funding (including salary & benefits) of two positions which did not previously exist at BCTC:

• School–to–Work Coordinator (Professional)

• Job Trainer (Paraprofessional)

Services to be provided through this interagency agreement are career and technical education instruction, work–based experiences, job development, placement and follow–up and job coaching.

The goals of the Work Partners Interagency Agreement are:

• To serve 50–65 OVR eligible youth with disabilities during FFY 2015, 2016 and 2017

• To achieve greater than 50 percent successful competitive, community–integrated job placements among those served

• To increase the number of students served in the Service Occupations Cluster

The Interagency Agreement was approved by the Berks CTC Board of Directors on May 28, 2014 and signed by the school’s authorized representative. Berks CTC provides 21.3 percent of project funding which serves as local/state match. OVR provides the remaining 78.7 percent from federal VR funds.

OVR is optimistic that this program has the potential for statewide replication. Pennsylvania has 67 counties, 15 OVR District Offices, and 85 Career & Technology Centers.

A second interagency agreement was developed with Greene County Human Services (GCHS), Intermediate Unit 1 (IU1) and OVR to provide school–to–work transition services for OVR eligible youth with intellectual disabilities enrolled in local education agencies within Greene County.

OVR, GCHS, and IU 1 will jointly provide funding in the amount of $60,000 per year for a two (2) year period to be used exclusively for the operation, and administration of the ”School–to–Work” services for OVR eligible youth with intellectual disabilities who are enrolled in local education agencies throughout Greene County.

Services to be provided through this interagency agreement are work–based educational experiences, on–the–job support though a job coach, independent living skills development and community involvement all oriented toward competitive, community–integrated employment.

The goals of the Greene County program are:

• During fiscal years 2014–2016 this pilot project will serve approximately 20 unduplicated OVR eligible and IDD waiver program eligible youth through this interagency agreement.

• As a result of the services provided through this agreement, it is expected that OVR will successfully place and vocationally rehabilitate approximately 54 percent of those individuals served.

For the Greene County Agreement, OVR will provide 78.7 percent of the funding (Federal– VR funding) and GCHS and IU 1 will each provide 10.65 percent of the funding, transferring to OVR 21.3 percent of the total (Local/ State match) funding.

Statewide replication of this program will provide OVR with opportunities to braid funding to serve OVR eligible youth with disabilities and to collaborate with the Departments of Education and Human Services more effectively.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; AND

Each Interagency Agreement may be amended only by written consent of all parties. Such amendments become part of the Interagency Agreements upon the signature of the respective designees. Signatories on the Work Partners project are Berks CTC and OVR. Signatories on the Greene County project are Greene County Human Services (GCHS), IU1 and OVR.

The parties to these agreements shall provide the services as specified and described in Appendix A of each of the Agreements. Such services shall be provided consistent with the budget as described in Appendix B of said Agreements.

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

All other State Plan requirements of the VR services portion of the State Plan will apply to the services approved under the waiver.

C. COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

Describe interagency cooperation with and utilization of the servivces and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

• Memoranda of Understanding currently exist between OVR, PDE and the Office of Developmental Programs (ODP). In light of the WIOA amendments, discussion has been initiated to update the MOUs.

• Discussions are underway to partner with the Juvenile Justice System and Area Office of Aging.

• Institute of Higher Education (IHE) Agreements, typically valid for five years, are currently being renewed.

• Partnership with PA Centers for Independent Living (CILs) in the form of grants, contracts, and LOUs are on–going.

• Interagency Agreements are being developed with local Career and Technology Centers; Berks County is already established.

• A Memoranda of Understanding (MOU) between OVR and DOC issued June 2013 streamlines the request for and receipt of information and waives fees to OVR for copies of documents identified in the MOU. OVR and DOC collaborate on training initiatives to assist individuals with disabilities in the correctional system.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

• Pennsylvania's Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, is Pennsylvania's statewide program under section 4 of the Assistive Technology Act. Activities that are provided by PIAT are: device demonstrations; device lending; device reuse; public awareness activities; and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to OVR staff and clients, mostly at no charge.

• OVR has multiple Assistive Technology (AT) providers on the fee schedule for customer services; some providers have LOUs.

• OVR establishes an annual contract via Invitation for Bid (IFB) with an AT provider for staff services.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

• Currently, OVR does not have any agreements with the US Department of Agriculture.

• OVR and Penn State University are currently in discussion about an amended LOU agreement for the AgrAbility program.

4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

• OVR has numerous LOUs with a variety of service providers serving all populations, including out–of–school youth.

• OVR has developed an On–the–Job Training (OJT) initiative specifically targeting youth.

• OVR has a goal to partner with community service providers to develop more programs to target transition aged youth.

5. STATE USE CONTRACTING PROGRAMS.

• As noted above, OVR has a MOU with ODP and is in the discussion stage of updating it.

• The possibility of an Interagency Agreement with the Department of Human Services (DHS) is being investigated.

• OVR oversees funding supplied by the Pennsylvania Public Utility Commission (PUC) to Temple University for the TDDP program.

• OVR oversees funding supplied by the PUC to the National Federation for the Blind for the Newsline Print Media Access Program.

• OVR has supported Temple University's efforts to begin a Wireless Expansion Initiative financially supported by the PUC.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU'S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (PA SLT) which evolved as the result of the IDEA Memorandum of Understanding implemented in 1999 and addended in 2006 and 2010. The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education's Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

As OVR awaits regulatory guidance from RSA, several initiatives are being developed to implement "pre– employment transition services" to increase interagency collaboration, to create and implement new interagency agreements and to update Memoranda of Understanding pertaining to transition from school to work and adult services. Technical assistance, agency cross–training and resource sharing will be required to assist LEAs to end utilization of sub–minimum wage employment as a model for transition planning. Discovery and customized employment as well as other innovative approaches will be utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment.

OVR's Transition Policy, which was updated as recently as 2013, will be updated again to reflect changes once final regulations of the Rehabilitation Act as amended by WIOA become available. Ongoing training and technical assistance will be provided to ensure that OVR is effectively providing Pre–Employment Transition Services to students with disabilities who are eligible or potentially eligible for VR services. Ongoing training is especially important due to the number of new OVR employees.

The policy provides for the following:

• Outreach to youth and young adults with disabilities and their families/advocates to provide information on OVR services and vocational planning beginning at age fourteen (14) or the age of onset of disability, if later.

• Accept referrals of students with disabilities at least two (2) years prior to graduation, or earlier on a case by case basis when appropriate.

• Provide consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act as amended and other legislation that affects youth and young adults with disabilities, other partners, and other resources.

• Refer cases from OVR's Bureau of Blindness and Visual Services (BBVS) Specialized Services to BBVS Vocational Rehabilitation when the students with disabilities reach transition age and eligibility is determined.

• Develop an Individualized Plan for Employment (IPE) for eligible customers before students with disabilities graduate or exit high school.

Each OVR district office will have a point of contact to collaborate with LEAs in its district. This will enable each LEA to speak with one contact person at each District Office. This point of contact will be responsible for contacting the appropriate OVR staff person and following up to assure that all questions and issues are resolved. Duties include:

• Collaboration with local education agencies (LEAs) and other community agencies that serve students and youth with disabilities.

• Provision of cross training for VR staff and LEA staff to provide a better understanding of transition policies and procedures.

• Professional cooperation so that instruction as outlined on a student's Individualized Education Plan (IEP) is consistent with the vocational goal on the IPE of a student with a disability.

• Seamless coordination of programs and supports as students with disabilities and youth with disabilities transition from entitlement to eligibility systems.

• Facilitation of self–advocacy and self–determination for transitioning students with disabilities and youth with disabilities.

Students with disabilities and youth with disabilities may be eligible, but may not be otherwise entitled under State and Federal law, to other services, including but not limited to mental health and intellectual disabilities services, vocational rehabilitation services, employment and training services, drug and alcohol services and other health related services.

LEAs are responsible for the provision of necessary goods and services for students with disabilities to access “a free and appropriate public education” to include the provision of transition services that promote movement from school to post–school activities as outlined in the IEP. Students with disabilities who may not be entitled to special education services under the Individuals with Disabilities Education Act (IDEA), as amended, are entitled to related aids and services under Section 504 of the Rehabilitation Act, as amended. LEAs are also responsible, under the Americans with Disabilities Act (ADA), to ensure that their facilities, resources and technology are accessible to the public.

OVR is responsible for the development of an IPE that promotes or facilitates the accomplishment of short–term, intermediate and long–term vocational rehabilitation goals and objectives. OVR will provide Pre–Employment Transition Services as regulated by the Rehabilitation Act as amended for eligible or potentially eligible students with disabilities with 15 percent of its federal allocation of General Funds to the maximum extent possible. All other services will be provided when necessary to determine eligibility for OVR services and if the services are in the individual’s IPE.

OVR may agree to cover costs if a local interagency agreement exists in which it is indicated that OVR shall do so, or if it is in the best interest of the student. In the latter instance, OVR staff will consider pursuing reimbursement from the LEA utilizing the interagency dispute resolution mechanism outlined in the state MOU.

OVR representatives will:

• Meet with school personnel to discuss OVR transition services whenever possible.

• Provide information regarding OVR programs and services available to students with disabilities and youth with disabilities.

• Assist the transitioning students with disabilities and youth with disabilities as well as their family/advocate with an application for OVR services.

• Serve as a consultant regarding employment supports and services.

• Supply information to students with disabilities and youth with disabilities regarding other relevant agencies and organizations.

• Attend school functions (i.e. college fairs, career days, disability fairs, open houses, etc.).

• Collaborate with the educational staff in providing career counseling and vocational exploration activities.

• Ensure that students and youth with blindness or a visual impairment are informed of BBVS Specialized Services for Children.

In order to identify youth and young adults with disabilities who may not be served in public schools under an IEP or 504 Plan, OVR will continue its collaborative relationships through its Memorandum of Understanding and local interagency agreements. This includes students and youth with disabilities covered under Chapter 15 of the Pennsylvania Standards and Regulations. Outreach will be conducted to identify youth and young adults with disabilities who are underserved through other community partners, such as, but not limited to: Intermediate Units; Career and Technology Centers; Private schools; Home schools; Student assistance programs; Summer employment programs; Local Workforce Development Boards; Home school organizations; Juvenile justice system; Foster youth organizations; Homeless shelters/programs; and Medical facilities.

OVR is the designated agency responsible to promote the employment of individuals with disabilities by providing vocational rehabilitation, job training, and placement services pursuant to the Rehabilitation Act of 1973, as amended, (29 U.S.C. §§ 701– et seq.), the Vocational Rehabilitation Act of 1988, (43 P.S. § 682.1 et seq.) and Article XXII of the Administrative Code of 1929, as amended, (71 P.S. §580.1 et. seq.).

Section 101(a)(8)(B) of the Rehabilitation Act requires OVR to have in place a mechanism for interagency coordination with public institutions for higher education to ensure the provision of vocational rehabilitation services that:

• identify financial responsibility;

• specify terms and conditions of reimbursement;

• provide a system for resolution of disputes; and

• set forth procedures for coordination of services to individuals with disabilities who are both customers of OVR and students of the institution of higher education.

Agreements have been achieved with the Pennsylvania State System of Higher Education (PASSHE) and all 14 community colleges. Negotiations continue with the four state–related institutions to include Penn State University, Lincoln University, Temple University and the University of Pittsburgh.

2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (PA SLT) which evolved as the result of the IDEA Memorandum of Understanding implemented in 1999 and addended in 2006 and 2010. The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education’s Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives,

and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

As OVR awaits regulatory guidance from RSA, several initiatives are being developed to implement “pre– employment transition services” to increase interagency collaboration, to create and implement new interagency agreements and to update Memoranda of Understanding pertaining to transition from school to work and adult services. Technical assistance, agency cross–training and resource sharing will be required to assist LEAs to end utilization of sub–minimum wage employment as a model for transition planning. Discovery and customized employment as well as other innovative approaches will be utilized to assist the students with the most significant disabilities to exit secondary school with the goal of achieving competitive, integrated employment.

OVR’s Transition Policy, which was updated as recently as 2013, will be updated again to reflect changes once final regulations of the Rehabilitation Act as amended by WIOA become available. Ongoing training and technical assistance will be provided to ensure that OVR is effectively providing Pre–Employment Transition Services to students with disabilities who are eligible or potentially eligible for VR services. Ongoing training is especially important due to the number of new OVR employees.

The policy provides for the following:

• Outreach to youth and young adults with disabilities and their families/advocates to provide information on OVR services and vocational planning beginning at age fourteen (14) or the age of onset of disability, if later.

• Accept referrals of students with disabilities at least two (2) years prior to graduation, or earlier on a case by case basis when appropriate.

• Provide consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act as amended and other legislation that affects youth and young adults with disabilities, other partners, and other resources.

• Refer cases from OVR’s Bureau of Blindness and Visual Services (BBVS) Specialized Services to BBVS Vocational Rehabilitation when the students with disabilities reach transition age and eligibility is determined.

• Develop an Individualized Plan for Employment (IPE) for eligible customers before students with disabilities graduate or exit high school.

Each OVR district office will have a point of contact to collaborate with LEAs in its district. This will enable each LEA to speak with one contact person at each District Office. This point of contact will be responsible for contacting the appropriate OVR staff person and following up to assure that all questions and issues are resolved. Duties include:

• Collaboration with local education agencies (LEAs) and other community agencies that serve students and youth with disabilities.

• Provision of cross training for VR staff and LEA staff to provide a better understanding of transition policies and procedures.

• Professional cooperation so that instruction as outlined on a student's Individualized Education Plan (IEP) is consistent with the vocational goal on the IPE of a student with a disability.

• Seamless coordination of programs and supports as students with disabilities and youth with disabilities transition from entitlement to eligibility systems.

• Facilitation of self–advocacy and self–determination for transitioning students with disabilities and youth with disabilities.

Students with disabilities and youth with disabilities may be eligible, but may not be otherwise entitled under State and Federal law, to other services, including but not limited to mental health and intellectual disabilities services, vocational rehabilitation services, employment and training services, drug and alcohol services and other health related services.

LEAs are responsible for the provision of necessary goods and services for students with disabilities to access "a free and appropriate public education" to include the provision of transition services that promote movement from school to post–school activities as outlined in the IEP. Students with disabilities who may not be entitled to special education services under the Individuals with Disabilities Education Act (IDEA), as amended, are entitled to related aids and services under Section 504 of the Rehabilitation Act, as amended. LEAs are also responsible, under the Americans with Disabilities Act (ADA), to ensure that their facilities, resources and technology are accessible to the public.

OVR is responsible for the development of an IPE that promotes or facilitates the accomplishment of short–term, intermediate and long–term vocational rehabilitation goals and objectives. OVR will provide Pre–Employment Transition Services as regulated by the Rehabilitation Act as amended for eligible or potentially eligible students with disabilities with 15 percent of its federal allocation of General Funds to the maximum extent possible. All other services will be provided when necessary to determine eligibility for OVR services and if the services are in the individual's IPE.

OVR may agree to cover costs if a local interagency agreement exists in which it is indicated that OVR shall do so, or if it is in the best interest of the student. In the latter instance, OVR staff will consider pursuing reimbursement from the LEA utilizing the interagency dispute resolution mechanism outlined in the state MOU.

OVR representatives will:

• Meet with school personnel to discuss OVR transition services whenever possible.

• Provide information regarding OVR programs and services available to students with disabilities and youth with disabilities.

• Assist the transitioning students with disabilities and youth with disabilities as well as their family/advocate with an application for OVR services.

• Serve as a consultant regarding employment supports and services.

• Supply information to students with disabilities and youth with disabilities regarding other relevant agencies and organizations.

• Attend school functions (i.e. college fairs, career days, disability fairs, open houses, etc.).

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• Career and Technology Centers

• Private schools

• Home schools

• Student assistance programs

• Summer employment programs

• Local Workforce Development Boards

• Home school organizations

• Juvenile justice system

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• Homeless shelters/programs

• Medical facilities

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• identify financial responsibility;

• specify terms and conditions of reimbursement;

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• set forth procedures for coordination of services to individuals with disabilities who are both customers of OVR and students of the institution of higher education.

Agreements have been achieved with the Pennsylvania State System of Higher Education (PASSHE) and all 14 community colleges. Negotiations continue with the four state–related institutions to include Penn State University, Lincoln University, Temple University and the University of Pittsburgh.

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS;

OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (PA SLT) which evolved as the result of the IDEA Memorandum of Understanding implemented in 1999 and addended in 2006 and 2010. The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education's Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

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The policy provides for the following:

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• Accept referrals of students with disabilities at least two (2) years prior to graduation, or earlier on a case by case basis when appropriate.

• Provide consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act as amended and other legislation that affects youth and young adults with disabilities, other partners, and other resources.

• Refer cases from OVR's Bureau of Blindness and Visual Services (BBVS) Specialized Services to BBVS Vocational Rehabilitation when the students with disabilities reach transition age and eligibility is determined.

• Develop an Individualized Plan for Employment (IPE) for eligible customers before students with disabilities graduate or exit high school.

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• Collaboration with local education agencies (LEAs) and other community agencies that serve students and youth with disabilities.

• Provision of cross training for VR staff and LEA staff to provide a better understanding of transition policies and procedures.

• Professional cooperation so that instruction as outlined on a student's Individualized Education Plan (IEP) is consistent with the vocational goal on the IPE of a student with a disability.

• Seamless coordination of programs and supports as students with disabilities and youth with disabilities transition from entitlement to eligibility systems.

• Facilitation of self–advocacy and self–determination for transitioning students with disabilities and youth with disabilities.

Students with disabilities and youth with disabilities may be eligible, but may not be otherwise entitled under State and Federal law, to other services, including but not limited to mental health and intellectual disabilities services, vocational rehabilitation services, employment and training services, drug and alcohol services and other health related services.

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disabilities who may not be entitled to special education services under the Individuals with Disabilities Education Act (IDEA), as amended, are entitled to related aids and services under Section 504 of the Rehabilitation Act, as amended. LEAs are also responsible, under the Americans with Disabilities Act (ADA), to ensure that their facilities, resources and technology are accessible to the public.

OVR is responsible for the development of an IPE that promotes or facilitates the accomplishment of short–term, intermediate and long–term vocational rehabilitation goals and objectives. OVR will provide Pre–Employment Transition Services as regulated by the Rehabilitation Act as amended for eligible or potentially eligible students with disabilities with 15 percent of its federal allocation of General Funds to the maximum extent possible. All other services will be provided when necessary to determine eligibility for OVR services and if the services are in the individual's IPE.

OVR may agree to cover costs if a local interagency agreement exists in which it is indicated that OVR shall do so, or if it is in the best interest of the student. In the latter instance, OVR staff will consider pursuing reimbursement from the LEA utilizing the interagency dispute resolution mechanism outlined in the state MOU.

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• Provide information regarding OVR programs and services available to students with disabilities and youth with disabilities.

• Assist the transitioning students with disabilities and youth with disabilities as well as their family/advocate with an application for OVR services.

• Serve as a consultant regarding employment supports and services.

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• Attend school functions (i.e. college fairs, career days, disability fairs, open houses, etc.).

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• Ensure that students and youth with blindness or a visual impairment are informed of BBVS Specialized Services for Children.

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• Intermediate Units

• Career and Technology Centers

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• Home schools

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• Juvenile justice system

• Foster youth organizations

• Homeless shelters/programs

• Medical facilities

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C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (PA SLT) which evolved as the result of the IDEA Memorandum of Understanding implemented in 1999 and addended in 2006 and 2010. The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education's Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

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OVR's Transition Policy, which was updated as recently as 2013, will be updated again to reflect changes once final regulations of the Rehabilitation Act as amended by WIOA become available. Ongoing training and technical assistance will be provided to ensure that OVR is effectively providing Pre–Employment Transition Services to students with disabilities who are eligible or potentially eligible for VR services. Ongoing training is especially important due to the number of new OVR employees.

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• Provide consultation to students with disabilities, youth with disabilities, parents/families/advocates, LEAs, and other transition partners on vocational issues, the Rehabilitation Act as amended and other legislation that affects youth and young adults with disabilities, other partners, and other resources.

• Refer cases from OVR's Bureau of Blindness and Visual Services (BBVS) Specialized Services to BBVS Vocational Rehabilitation when the students with disabilities reach transition age and eligibility is determined.

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• Collaboration with local education agencies (LEAs) and other community agencies that serve students and youth with disabilities.

• Provision of cross training for VR staff and LEA staff to provide a better understanding of transition policies and procedures.

• Professional cooperation so that instruction as outlined on a student's Individualized Education Plan (IEP) is consistent with the vocational goal on the IPE of a student with a disability.

• Seamless coordination of programs and supports as students with disabilities and youth with disabilities transition from entitlement to eligibility systems.

• Facilitation of self–advocacy and self–determination for transitioning students with disabilities and youth with disabilities.

Students with disabilities and youth with disabilities may be eligible, but may not be otherwise entitled under State and Federal law, to other services, including but not limited to mental health and intellectual disabilities services, vocational rehabilitation services, employment and training services, drug and alcohol services and other health related services.

LEAs are responsible for the provision of necessary goods and services for students with disabilities to access "a free and appropriate public education" to include the provision of transition services that promote movement from school to post–school activities as outlined in the IEP. Students with disabilities who may not be entitled to special education services under the Individuals with Disabilities Education Act (IDEA), as amended, are entitled to related aids and services under Section 504 of the Rehabilitation Act, as amended. LEAs are also responsible, under the Americans with Disabilities Act (ADA), to ensure that their facilities, resources and technology are accessible to the public.

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OVR may agree to cover costs if a local interagency agreement exists in which it is indicated that OVR shall do so, or if it is in the best interest of the student. In the latter instance, OVR staff will consider pursuing reimbursement from the LEA utilizing the interagency dispute resolution mechanism outlined in the state MOU.

OVR representatives will:

• Meet with school personnel to discuss OVR transition services whenever possible.

• Provide information regarding OVR programs and services available to students with disabilities and youth with disabilities.

• Assist the transitioning students with disabilities and youth with disabilities as well as their family/advocate with an application for OVR services.

• Serve as a consultant regarding employment supports and services.

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D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

OVR continues to collaborate with its agency partners on the Pennsylvania Statewide Leadership Team (PA SLT) which evolved as the result of the IDEA Memorandum of Understanding implemented in 1999 and addended in 2006 and 2010. The PA SLT has recommended that the IDEA Memorandum of Understanding be revised to incorporate changes in Transition Services regulated by WIOA and the Rehabilitation Act of 1973 as amended. OVR representatives meet regularly with representatives from the Pennsylvania Department of Education's Bureau of Special Education and Bureau of Career & Technology Education to review policies, procedures, initiatives, and projects to ensure that eligible students with disabilities who are still enrolled in secondary education and youth with disabilities who are no longer engaged in secondary education are receiving the vocational rehabilitation services that they need to successfully transition from school to work and independence.

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E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The PA Office of Vocational Rehabilitation (OVR) maintains negotiated Letters of Understanding (LOUs) with more than 200 community service providers covering more than 1,000 different rehabilitation, independent living and related services. Many of those organizations are private and/or not–for–profit community rehabilitation providers.

LOUs define service programs and the corresponding conditions of purchase, including fees and effective/expiration dates, which exist between a rehabilitation service provider and OVR.

A LOU entered between OVR and a community service provider creates a locally developed, locally negotiated, and locally sensitive response to the rehabilitation service needs of persons with significant disabilities in the diverse areas of the commonwealth.

A LOU is neither a contract nor an agreement. It does not commit either provider or OVR to the sale or purchase of the defined services.

The continuing use of a LOU for OVR customers is reliant upon customer choice, satisfaction with the service, affordability, and the existence of available alternative services.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

OVR will coordinate with other State agencies such as the Office of Developmental Programs, Office of Mental Health and Substance Abuse Services, Office of Long Term Living, and other entities to provide supported employment services and extended employment services. OVR will continue to communicate and collaborate with these agencies to provide quality supported employment services and provide referrals and information regarding mutual customers. OVR will provide up–to–date information and training to State agencies and other entities to ensure the provision of supported employment services and extended services.

G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

PA OVR is routinely engaged with employer/business customers to better understand their workforce needs and how public VR can build our supply side of talent, i.e. the job seekers' industry skills to meet the demands required to help our business customers to be successful in competing in today's global marketplace. To accomplish this, OVR has Central Office staff who are available to meet with an employer to listen and explore their organization's unique culture to learn about the services or products they produce, to learn about talent needs, and how the leadership of a company or organization envisions their future workforce succession planning. Where possible, OVR will coordinate business outreach with other workforce and economic development partners, including Industry Partnerships and other multi–employer workforce partnerships.

1. In response to an organization's demand side needs, OVR can suggest a talent recruitment process to bring qualified pre–screened individuals with a disability into their organization.

2. OVR will work with each business to target career ladders and pathways in competitive integrated employment that is a match to each VR consumer customer's unique aspirations, capacities and career goals and the succession plans of an organization.

3. OVR will keep the process simple by using a Single Point of Contact (SPOC) approach modeled after the Council of State Administrators of Vocational Rehabilitation (CSAVR) model to provide a national network of Points of Contact when large employers have needs across several states and regions.

OVR will provide:

1. National outreach to employers/businesses through the CSAVR National Employment Team, the VR–NET, and by participation in the Talent Acquisition Portal (TAP).

2. Statewide outreach through the Business Services and Outreach Division (BSOD) Chief, with Western, Central and Eastern BSOD Specialists by in–person meetings, regional and statewide Chamber of Commerce membership, networking, and Society of Human Resource Manager (SHRM) statewide and local organization involvement.

3. Local outreach through local combined agency District Offices and Hiram G. Andrews Center–HGAC Business Services team outreach in follow–up to VR–NET national inquiries by business, or BSOD Chief, Western, Central or Eastern Specialist employer/business contacts. Local combined agency teams will then actively coordinate recruitment, on–boarding supports for qualified pre–screened VR hires and successful job performance and follow–up to ensure the continuing success of new talent and the overall satisfaction of the businesses and organizations who recruit OVR talent.

4. No–cost consultation to employers on disability etiquette, accessibility, accommodation needs and assistance to help retain an employer's workforce members following an injury or the onset of a disability.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

OVR will collaborate with employers, Industry Partnerships and other multi–employer workforce partnerships to provide students and youth with disabilities opportunities for career exploration that would lead to competitive, integrated employment. Students and youth with disabilities will be given opportunities to complete work–based learning experiences to develop soft skills and work–related skills. Students and youth with disabilities may be afforded opportunities to complete mock interviews with employers, job shadowing experiences, career days, disability mentoring days with employers, and other pre–employment transition services to prepare students for competitive integrated employment.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

As a key member of the PA Employment First State Leadership Mentoring Project currently sponsored by a grant administered by the Office of Disability Employment Policy, OVR will partner with agencies within the Department of Human Services to ensure that the employment needs of individuals with disabilities are met, that cost services are comprehensive, effective, innovative and not duplicative, and that every individual with a disability who wants to work to achieve self–support will be given the opportunity to do so. The Departments of Labor & Industry, Education, Human Services, Transportation and Health, under the leadership of OVR, will execute and commit to coordinating the interagency agreement and collaboration required to secure and maintain community integrated employment for youth and adults with disabilities. Elements of the inter–departmental and interagency agreement shall fully address:

1. interdepartmental eligibility and enrollment processes;

2. data collection, sharing and reporting;

3. service coordination, resource leveraging and braiding of funding; and

4. quality assurance and improvement resulting in the collective accountability and performance measurement needed to substantially increase the numbers of Pennsylvanians in competitive integrated employment.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

The agreements below outline the responsibilities of each agency in the area of service delivery and funding. OVR and ODP are currently working on a coordination policy to enhance the employment outcomes for individuals with intellectual disabilities. The intended result is for a more seamless entry into employment for individuals with intellectual disabilities and for the coordination of extended services to allow individuals to maintain long–term employment. This is important because many of the supported employment services assist individuals with intellectual disabilities to gain, stabilize and maintain successful employment.

3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

OVR uses many avenues to ensure collaboration and partnership in the delivery of supported employment and extended services. These include a formal written MOU at the state level between OVR, the Office of Mental Health and Substance Abuse Services (OMHSAS) and the Office of Developmental Programs (ODP). At the local level, agreements between the 21 OVR District Offices and 43 ODP/OMHSAS Administrative Entities exist to ensure that shared customers of both funding sources are receiving needed services at the appropriate time.

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

As of December 31, 2014 OVR had 1,029 filled salaried positions and 146 vacancies. This figure includes 198 filled salaried positions at the Hiram G. Andrews Center (HGAC). Statewide, OVR had a total of 405 filled Vocational Rehabilitation (VR) Counselor positions, 23 Vision Rehabilitation Therapist positions, and 11 Orientation and Mobility Specialists positions. The current complement of VR Counselors requires that OVR maintain an Order of Selection in order to adequately serve and meet the needs of eligible VR customers at this time.

• VR Counselor: 400 Filled Positions; 25 Vacancies; 92 Projected Vacancies in Next 5 Years

• VR Counselor Deaf and Hard of Hearing: 19 Filled Positions; 2 Vacancies; 4 Projected Vacancies in Next 5 Years

• VR Counselor Placement: 1 Filled Position; 0 Vacancies; 1 Projected Vacancy in Next 5 Years

• Vision Rehabilitation Therapist: 23 Filled Positions; 1 Vacancy; 3Projected Vacancies in Next 5 Years

• Orientation and Mobility Specialists: 11 Filled Positions; 7 Vacancies; 6 Projected Vacancies in Next 5 Years

OVR projects that in the next five years approximately 97 VR Counselors will become eligible to retire. This will be an average of 19 VR Counselors retiring per year. However, additional numbers of new VR Counselors will be needed due to promotions of VR Counselors to higher positions within OVR. OVR projects that an average of 20–25 new VR Counselors will be hired per year in the next 5–10 years. To assist with recruitment of VR Counselors, OVR plans to continue its expanded utilization of the “VR Counselor Internship” Program to attract qualified VR Counselors during their last semester of graduate school. There is expected to be an adequate number of VR Counselor candidates to fill vacancies over the next 5–10 years. However, certain locations within the state may require targeted recruitment efforts at any given time.

During FFY 2014, 21,264 individuals applied for VR services, 16,241 individuals were found eligible for VR services and approximately 55,000 individuals received VR services from OVR. As a result, 8,546 individuals were placed in employment in FFY 2014. In the same time period, 3,671 individuals received Independent Living Older Blind Services and 1,379 individuals were referred to the Hiram G. Andrews Center.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

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iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

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B. PERSONNEL DEVELOPMENT

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

CORE–accredited university programs in Pennsylvania include: Pennsylvania State University, the University of Pittsburgh, the University of Scranton and Edinboro University of Pennsylvania. These programs graduate approximately 47 students per year with a Master's Degree in Rehabilitation Counseling.

• Penn State University: 20 Students Enrolled; 21 graduates from the previous year

• University of Pittsburgh: 39 Students Enrolled; 8 graduates from the previous year.

• Edinboro University of PA: 13 Students Enrolled; 7 graduates from the previous year.

• University of Scranton: 29 Students Enrolled; 11 graduates from the previous year.

No employees were sponsored by the agency and/or RSA. 6 Penn State University graduates were sponsored by RSA.

By providing the number of individuals who have obtained a master's degree in rehabilitation counseling, we are suggesting that this is also the number of personnel who are eligible for certification (CRCC) or licensure.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

CORE–accredited university programs in Pennsylvania include: Pennsylvania State University, the University of Pittsburgh, the University of Scranton and Edinboro University of Pennsylvania. These programs graduate approximately 47 students per year with a Master's Degree in Rehabilitation Counseling.

• Penn State University: 20 Students Enrolled; 21 graduates from the previous year

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By providing the number of individuals who have obtained a master's degree in rehabilitation counseling, we are suggesting that this is also the number of personnel who are eligible for certification (CRCC) or licensure.

iii. the number of students who graduated during the prior year from each of theose institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

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By providing the number of individuals who have obtained a master's degree in rehabilitation counseling, we are suggesting that this is also the number of personnel who are eligible for certification (CRCC) or licensure.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

OVR Counselor Recruitment

In addition to the 47 available students graduating from in–state graduate degree programs, Pennsylvania OVR can recruit students from CORE–approved and other universities that offer a Master's Degree in Rehabilitation Counseling nationwide. Pennsylvania residency requirements are waived under the State Civil Service Commission for the VR Counselor Internship position and other VR Counselor classifications in OVR. This waiver provides OVR with an opportunity to recruit students nationwide and offer paid VR Counselor Intern positions to interested master's degree

students who are in their final semester of graduate school. This paid internship allows OVR to attract and recruit candidates for VR Counselor positions who have a Master's Degree in Rehabilitation while they are still in school and before they are recruited by other agencies. The residency waiver and the paid Internship position also assist in OVR's efforts to recruit and hire individuals with disabilities and those from diverse and minority backgrounds.

OVR's Counselor Internship program continues to serve as an example amongst state VR agencies that seek to attract rehabilitation counseling students for employment. While surrounding states offer internship opportunities to students with competitive compensation, none within the northeastern region offer permanent positions to interns upon satisfactory completion of the probationary period and/or successful completion of the rehabilitation counseling graduate degree.

Through collaborative initiatives with higher education institutions, OVR will continue to expand recruitment and outreach to students with disabilities for entry–level VR Counselor positions. Collaboration with universities on federal RSA grant applications that seek to provide scholarship opportunities for students with disabilities will further this initiative. This includes supporting the efforts of university programs to apply for and implement Long Term Training Grant programs to train VR Counselors to work for the public VR program in Pennsylvania. In addition, OVR will continue the following activities as part of its overall VR Counselor recruitment initiative:

• Expand and maintain OVR's partnership with Historically Black Colleges and Universities (HBCU's) that offer a Master's Degree Rehabilitation Counseling Program. This includes campus visits, onsite presentations, use of telecommunication technology, and one–on–one meetings with students for targeted recruitment. OVR has established relationships with the following HBCUs nationwide: Alabama State University, University of the District of Columbia, Fort Valley State University, Southern University and A&M College, Coppin State University, University of Maryland Eastern Shore, North Carolina A&T State University, Winston–Salem State University and South Carolina State University. OVR will also continue to build relationships with program coordinators at graduate training programs in Puerto Rico who offer rehabilitation counseling disciplines including Bayamon Central University, Pontifical Catholic University of Puerto Rico and University of Puerto Rico.

• Maintain appointed membership on Coppin State University (CSU) and the University of Maryland Eastern Shore (UMES) Rehabilitation Counseling Program Advisory Committees. Both are HBCU's in the Mid–Atlantic region that prepare increased numbers of minority individuals for careers in the public VR program.

• Maintain active membership with the National Association of Multicultural Rehabilitation Concerns (NAMRC) and the National Council on Rehabilitation Education (NCRE).

• Visit colleges, universities, and appropriate job fairs in conjunction with the Office of Equal Opportunity in L&I in order to recruit potential job applicants who are from diverse cultural backgrounds and applicants with disabilities.

Orientation and Mobility Specialists and Vision Rehabilitation Therapists

Accredited university programs in Pennsylvania that train Orientation and Mobility Specialists and/or Vision Rehabilitation Therapists include: Salus University, the University of Pittsburgh's Vision Studies Program, and Kutztown University. These programs graduate a combined total of approximately 45 students per year. Graduates of these approved university programs are eligible for certification in Vison Rehabilitation Therapy or in Orientation and Mobility from the Academy for

the Certification of Vision Rehabilitation and Education Professionals (ACVREP). In addition, OVR is able to recruit and hire Vision Rehabilitation Therapists and Orientation and Mobility Specialists who are being trained at universities nationwide and who reside outside of Pennsylvania.

Civil service test announcements for the Orientation and Mobility Specialist (O&M) Intern and Vision Rehabilitation Therapist (VRT) Intern positions were made available as of July 22, 2015. The Bureau of Blindness and Visual Services now offers paid internships for O&M and VRT students during their last semester of study. The O&M and VRT hourly wage is equivalent to the VRC Intern at Group 5 Step 1. This initiative will likely increase the candidate pool of available O&M and VRT professionals who are available for employment with PA OVR BBVS upon successful completion of their academic training.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

Section 101(a)(7) of the Rehabilitation Act as amended, or the Comprehensive System of Personnel Development (CSPD), requires that State Vocational Rehabilitation agencies establish personnel standards for rehabilitation staff, including Vocational Rehabilitation (VR) Counselors, that are consistent with any national or state-approved or recognized certification, licensing or registration that applies to a particular profession. The purpose of an agency’s CSPD is to ensure the quality of personnel who provide VR services and who assist individuals with disabilities to achieve competitive employment outcomes through the VR program.

New Vocational Rehabilitation Counselors In 2002, OVR raised the entry-level requirements for VR Counselor positions to reflect the requirements established by the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselors (CRC). Specifically, all newly hired VR Counselors are required to possess a Master’s Degree in Rehabilitation Counseling, Rehabilitation Administration or Rehabilitation Education; or CRC credentials or documented proof from CRCC of eligibility to obtain CRC credentials. The revised Civil Service Announcement for VR Counselor positions became effective on October 4, 2002. As of January 2015, a total of 672 VR Counselors and VR Counselor Interns were hired under the new entry-level requirements. All 672 new VR Counselors and Interns met CSPD standards for qualified rehabilitation professionals upon being hired.

The change in entry-level standards for VR Counselors, requiring a Master’s Degree in Rehabilitation or CRC credentials or CRC eligibility, includes the following components that seek to ensure an adequate supply of VR Counselors to meet OVR’s staffing needs for the next 5-10 years:

• Waiver of Residency - OVR has received, from the Pennsylvania Civil Service Commission, a waiver of Pennsylvania residency as a condition of application for the positions of Vocational Rehabilitation Counselor and VR Counselor Intern.

• Review of Experience and Training - OVR received approval from the Pennsylvania Civil Service Commission to implement an Experience and Training Examination as the means to assess a candidate's qualifications for the position of VR Counselor. This "review of experience and training" replaces the former written Civil Service Vocational Rehabilitation Counselor Exam. The new VR Counselor Civil Service Position Announcement and the Experience and Training Review will remain open "until further notice" in order to assist with recruitment efforts and to ensure an adequate supply of qualified candidates.

• Designated Recruitment Specialist - OVR has designated a Rehabilitation Specialist position for the purpose of actively recruiting qualified VR Counselors within Pennsylvania and nationwide. This Specialist is assigned to work in the OVR Central Office and coordinates all OVR Counselor recruitment activities. The Recruitment Specialist, with the assistance of CORE-approved university faculty, field office staff, active OVR Advisory Councils, the Pennsylvania Social Services Union, and other key stakeholders, has developed and is implementing a proactive OVR Recruitment Plan. The goal of this plan is to attract and recruit adequate numbers of qualified VR Counselors, including those with disabilities and those from diverse cultural backgrounds and underrepresented groups, to fill future anticipated Counselor vacancies. The Recruitment Plan includes recruitment efforts to ensure an adequate supply of VR Counselors trained to provide services to specialty caseloads such as Counselors for the Deaf and Hard of Hearing and Counselors for the Blind and Visually Impaired.

• Paid Internship Program - OVR continues to utilize and expand the OVR paid Internship Program. This includes a waiver of Pennsylvania residency, so that the Internship Program can include out-of-state residents as candidates for employment. This provides OVR with an edge in recruiting qualified VR Counselors while they are still in the final year of their Master's Degree in Rehabilitation Counseling Program. The Paid Internship Program offers a Master's Degree candidate, enrolled in an approved CORE accredited master's degree program in Rehabilitation Counseling, a permanent position as a VR Counselor upon graduation and the successful completion of the paid internship with OVR.

Effective January 7, 2006, OVR received approval to hire VR Counselor Interns as a salaried position instead of as an hourly position. This means that VR Counselor Interns will accrue sick days and vacation days and will receive health insurance, group life insurance and other employee benefits upon their date of hire. This change adds an additional employment incentive for Intern candidates to choose to work for Pennsylvania OVR. This continues to make Pennsylvania OVR an attractive and competitive employer of VR Counselors nationwide.

Effective November 1, 2006, OVR received approval to increase the pay scale for VR Counselor Interns statewide, and to hire staff above the minimum for VR Counselor Interns who choose to work in Norristown and Philadelphia District Offices. The annual salary statewide for the classification of VR Counselor Intern was increased from Pay Scale 4 to Pay Scale 5. Norristown and Philadelphia District Offices are authorized to hire VR Counselor Interns at Pay Scale 5, Step 9. This targeted increase for new staff in southeastern district offices provides an additional recruitment and hiring incentive for this challenging recruitment area and should help to relieve the higher numbers of vacancies in these offices.

Additional salary incentives have been implemented to assist with recruitment efforts to include:

• Norristown and Philadelphia District Offices are authorized to hire VR Counselors at Pay Scale 7, Step 5, which is consistent with the increase in these areas for VR Counselor Interns. • VR Counselors for Deaf and Hard of Hearing in all offices across the commonwealth are authorized to be hired at a higher pay scale level (Pay Scale 7, Step 5). • Vocational Rehabilitation Supervisors who are employed in the Philadelphia and Norristown District Offices receive a four pay step increase.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

OVR ensures that personnel have a 21st-century understanding of the evolving labor force and the needs of individuals with disabilities through staff training, professional development and continuing education on labor market information and trends, as well as, training on assessment, rehabilitation technology, Social Security work incentive programs, including programs under the Ticket to Work and Work Incentives Improvement Act of 1999, training to facilitate informed choice under this program, and training to improve provision of services to culturally diverse populations. Training jointly developed between OVR and the PA Department of Labor & Industry's Center for Workforce Information and Analysis (CWIA) equip field staff with the knowledge to blend existing information about labor market trends with customer abilities, limitations and interests to develop appropriate job goals, with the hope of increasing successful long-term placements.

OVR continues its annual Business Services Outreach training to enhance professional growth and skills of staff on emerging practices relevant to job readiness/soft skill competencies, job search skills, transferrable skills, when to disclose a disability to an employer, how to address criminal history, how to request an accommodation, tax credits, and on-the-job training (OJT), and resources that focus on developing effective relationships with employers in the public and private sectors. To train and retain qualified personnel OVR will continue to provide training by university faculty, experts in the field of rehabilitation, and statewide and nationally known speakers on understanding the medical and psychosocial aspects of various disabilities; case management, best practices on developing effective relationship with employers, and understanding the effective utilization of rehabilitation technology.

To increase understanding of the needs of individuals with disabilities, OVR will continue to work collaboratively with local community colleges, career and technical schools and other Perkins recipients to explore the development of training programs that are implemented with universal design to train individuals with disabilities for competitive integrated employment in jobs that meet local labor market demand. Additionally, OVR has expanded its rehabilitation team in district offices to include Business Services Representatives (BSRs) and Early Reach Coordinators (ERCs). OVR's Early Reach Initiative was started in response to a need in the BVRS district offices to increase capacity to prepare students and youth with disabilities, beginning at age 14, for vocational planning and future OVR services. Early Reach is an outreach initiative intended to promote successful outcomes for students and youth with disabilities by increasing awareness of OVR services and the benefits of early career planning. More recently BSRs were established to represent OVR and our customer talent during outreach to Employers and Businesses throughout the geographic area of

their assignments to develop job opportunities and foster good working relationships with the business community.

4. STAFF DEVELOPMENT.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. SYSTEM OF STAFF DEVELOPMENT

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services. OVR will no longer have the support of the RSA In–Service training grants, inclusive of the Basic and Quality Award Grants, as these programs were eliminated with the end of the five year grant in September 2015. Nevertheless, OVR will continue to provide for the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

We are committed to a focus on certain priorities identified as "Customer Service" and "Multicultural Competency" in addition to the priorities included with the implementation of WIOA to include business services, transition services and supported employment. In addition, particular attention will be devoted to offering training on assessment, vocational counseling, job placement, and rehabilitation technology.

As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff.

In order to ensure that OVR's personnel receive significant knowledge from research and other state–of–the–art methodologies, OVR seeks out and provides presentations by university faculty experts in the field of rehabilitation, and statewide and nationally known speakers at in–service training programs. In addition, OVR coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

OVR is committed to offering a plan for a comprehensive system of staff development and training. The goal is to ensure staff development for OVR personnel in areas essential to the effective management of OVR's program of VR services. OVR will no longer have the support of the RSA In–Service training grants, inclusive of the Basic and Quality Award Grants, as these programs were eliminated with the end of the five year grant in September 2015. Nevertheless, OVR will continue to provide for the training and development of personnel necessary to improve their ability to provide VR services leading to employment outcomes for individuals with disabilities, especially those with the most significant disabilities.

We are committed to a focus on certain priorities identified as "Customer Service" and "Multicultural Competency" in addition to the priorities included with the implementation of WIOA to include business services, transition services and supported employment. In addition, particular attention will be devoted to offering training on assessment, vocational counseling, job placement, and rehabilitation technology.

As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff.

In order to ensure that OVR's personnel receive significant knowledge from research and other state–of–the–art methodologies, OVR seeks out and provides presentations by university faculty experts in the field of rehabilitation, and statewide and nationally known speakers at in–service training programs. In addition, OVR coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Entry–level requirements for Rehabilitation Counselors for the Deaf and Hard of Hearing require that candidates pass the Sign Communication Proficiency Interview (SCPI) before being offered a formal interview for employment. OVR district offices, in geographic areas where there are large numbers of individuals who speak Spanish, recruit and hire a Vocational Rehabilitation Counselor who can speak both Spanish and English. In instances where there are no Vocational Rehabilitation Counselors who can communicate with a customer in his or her native language, an interpreter is hired to assist with communication.

Special Populations OVR plans to continue efforts to work with the blind and deaf communities in order to recruit and hire qualified individuals who are deaf, blind, deaf–blind and hard of hearing. This includes recommendations and assistance provided by the OVR Advisory Committee for Persons who are Deaf and Hard of Hearing and the OVR Advisory Committee for the Blind of Pennsylvania. In addition, OVR has a Rehabilitation Specialist assigned to coordinate the Deaf, Hard of Hearing and Deaf–Blind Program in OVR. This specialist assists with recruitment and outreach to these special populations in order to attract qualified OVR candidates for employment.

6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

Training on OVR's Transition policy will be provided for the benefit of new counselors and Early Reach Coordinators (ERCs). The emphasis will be on their roles and responsibilities as Transition counselors and ERCs and their interactions with OVR's partners and stakeholders across the state.

The Transition Resource Manual has been placed on an internal computer drive and is available for viewing and reference by all OVR staff. Updates and additions will be made as necessary.

New transition brochures have been forwarded to be posted on the Pennsylvania Training and Technical Assistance Network (PaTTAN) website, secondarytransition.org. Information on OVR initiatives will be forwarded as they become available. Future updates to new and existing brochures and informational handouts will be developed and posted on the internal drive and secondarytransition.org as necessary.

Mandated Reporter Training is available online through the Department of Human Services (DHS) and Rehabilitation & Community Providers Association. The training is required for any OVR personnel working with youth.

OVR counselors will continue to be encouraged to participate in local Transition Council meetings so that they may be of service to the families, students and professionals.

OVR will promote training opportunities provided by PDE and other Transition partners as a means of broadening the scope of topics available to OVR staff.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

This year OVR focused on the provider side of the equation to ensure the best service possible to meet the needs of our customers. OVR has worked on its public image and information sharing, relationships with other state agencies and community organizations, and creating more standard operating procedures so that each customer receives the same stellar service from OVR staff. Below are the categories outlined by RSA and an update on how we worked to set and meet goals in that category.

The CSNA identified specific needs for individuals with most significant disabilities as well as barriers to employment such as transportation, significance of disability, and individuals with disabilities in rural areas. Transportation assistance would help them secure employment as many cited transportation as the single greatest barrier to employment. The CSNA found that individuals with the most significant disabilities may have difficulties receiving services due to the presence of multiple disabilities. OVR will identify strategies and best practices to increase targeted outreach to individuals to individuals in rural settings and will advocate for increased transportation options for individuals with disabilities. Supported employment (SE) services are a mainstay for many OVR customers to gain competitive, community-integrated employment. These services offer supports that allow individuals with the most severe disabilities not only to gain employment, but also to become stable and hold their jobs and positions in the long-term. SE provides a support structure that allows customers to use their strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice in gaining employment in the community. It also provides a method of assisting customers to acquire new skills and talents in the search for employment and on the work site while employed. SE services are typically provided by community service providers acting in conjunction with the OVR counselor and customer to learn the aspects of the job setting, employer expectations, workplace etiquette and other skills needed to build a solid work performance. SE services benefit the employer as well by providing assistance in instruction and on-site problem-solving for the customer with a disability and helping the customer to learn work skills as quick and efficiently as possible.

B. WHO ARE MINORITIES;

A public awareness strategy was developed by the Public Awareness/Outreach in–house workgroup. Thus far, a media review of all OVR print and web media has been conducted. Out–of–date information and policies have been removed or updated and translated into other languages. OVR continues to have weekly meetings with the L&I Press Office to discuss the future media focus for OVR. OVR established the MOD Squad, a group composed of OVR counselors and Central Office staff to examine the many facets of social media and how OVR could best utilize it. In the fall of 2013, OVR launched its Facebook and LinkedIn pages providing more access, availability and awareness of OVR.

An increasing number of minorities who are applying for and becoming eligible for VR services within Pennsylvania have a criminal history. While having a criminal history/record is not a condition of eligibility for vocational rehabilitation services, the number of minorities who do have disabilities and involvement with the criminal justice system is rapidly increasing. It is important to involve as many partners as possible when working with these individuals because having a criminal record is a barrier to many employment opportunities. Additionally, there is an added level of issues that need to be addressed when a person has major criminal convictions and/or conditions of supervision, i.e. probation or parole. Helping OVR customers understand what responsibilities they have to meet such conditions or how their criminal charges and/or convictions affect their employment opportunities is critical to the success of customers in their pursuit of employment. The ultimate outcome is to assist customers to gain competitive community integrated work by teaming collaboratively with the individual and community partners to remove all barriers.

C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The most recent CSNA results indicate the state’s Spanish speaker populations is growing and counselors describe increasing demand for services in Spanish. Latinos with disabilities in PA is considered an unserved and underserved population that needs greater focus and outreach. OVR

plans to focus on the Latino population's rehabilitation needs by identify and expanding best practices and services. For example, Goodwill Keystone Area requests to enter into a Letter of Understanding (LOU) with the Reading District Office of Vocational Rehabilitation (OVR) to provide comprehensive basic work skills development and job placement, retention, and advancement services to Latinos with disabilities in Berks County through its Specialized Training and Employment Program (aka, Latino STEP). Latino STEP was piloted in Berks County during October 2014 through September 2015 using OVR Innovation and Expansion project funds. In addition, OVR will continue to strive for and exhibit further cultural competency and best practices in terms of serving minority populations. Staff training and professional development on cultural competency will continue to be a focus. Transition services within OVR have been identified as a core function of our public vocational rehabilitation program. An internal transition manual was created to help OVR VR professionals better serve this customer population. This guide was developed to assist all OVR rehabilitation professionals deliver services that result in optimal outcomes for youth and young adults with disabilities. The following document provides a comprehensive resource aligned with OVR's School to Work Transition policy.

Rehabilitation professionals work with transition age youth and young adults with disabilities beginning at age 14 through 21 years of age. For the Bureau of Blindness & Visual Services (BBVS), this means helping young children in school (and their families/advocates) so they may maximize their elementary, middle, and high school experiences, and in doing so optimize their chances of success when they transition to adult life, higher education and/or work. For the Bureau of Vocational Rehabilitation Services (BVRS), this means working with youth and young adults starting at an earlier age (and their families/advocates) so they know what services we offer and how they can maximize their high school experience, whether through general education or special education, to optimize their chances of success when they transition to adult life, higher education and/or work.

Rehabilitation professionals who work with youth and young adults are encouraged to coordinate their efforts with their BBVS/BVRS counterparts including Vocational Rehabilitation Counselors (VRC) from BBVS and BVRS, Early Reach Coordinators (ERC), BBVS Social Workers, Orientation and Mobility Specialists (O&M), and Vision Rehabilitation Therapists (VRT). All of these professionals should spend time in the schools forming relationships with transition partners, working with youth and young adults with disabilities and establishing consistent routines.

The Early Reach Initiative was started in OVR in response to a need in the BVRS district offices to increase capacity to prepare youth with disabilities, beginning at age 14, for vocational planning and future OVR services.

In 2012, OVR re-classified seventeen existing positions to the Pennsylvania State Civil Service Commission "Social Work 2" position. A formal job description for a Social Worker 2 in BVRS was finalized with a working job title of Early Reach Coordinator (ERC). An Early Reach Coordinator position was assigned to each of the 15 BVRS district offices, with a second Early Reach Coordinator position assigned to both Philadelphia and Pittsburgh. The scope of the Early Reach Initiative and the functions of an Early Reach Coordinator were developed and implemented by a Phase 1 Management Implementation Work Group.

Subsequently, the Early Reach Initiative was gradually implemented in BVRS district offices in three phases according to the following schedule:

Fall 2013 - Phase 1 - DuBois, Harrisburg, Norristown, Philadelphia, Wilkes-Barre Spring 2014 - Phase 2 - Allentown, Altoona, Erie, Pittsburgh, Washington, York Fall 2014 - Phase 3 - Johnstown, New Castle, Reading, Williamsport

Comprehensive training was provided to all Early Reach Coordinators, supervisors and management in each BVRS district office during implementation of the three phases. In addition, monthly conference calls were held with offices in each phase to prepare for and facilitate a smooth implementation in each district office. In addition, for interested offices, a general overview that outlined the Early Reach Initiative was provided to all staff in each district office during implementation. The first statewide presentation that introduced the Early Reach Initiative in a public forum was at the 2014 Transition Conference held in State College.

As of the final Phase 3 Early Reach Coordinator Training held February 24 - 27, 2015, all BVRS District Offices are implementing the Early Reach Initiative.

D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND

Individuals served by other components of the statewide workforce investment system, which includes PA CareerLink, PA Department of Human Services, PA Department of Education, and other partnering agencies such as Aging, Corrections, and Veterans Affairs, expressed frustration in the lack of cooperation across multiple systems. Individuals cited lack of communication across departments and funding disincentives. Too many workforce programs operate in their own individual silos rather than being integrated into an overall system that allows leveraging multiple funds to better serve employers, job seekers and incumbent workers. Recommendations to help address these needs included; increased focus on communication, identifying strategies and best practices that will ensure improved collaboration and service delivery among workforce partners, and cross agency training to help staff in each program area understand the services available and how to best leverage resources. In the fall of 2013, an employer-friendly “how to” manual was introduced, to ensure consistent and excellent service when it comes to hiring people with disabilities. The manual was compiled by staff from OVR, PDE, DHS-ODP and DHS-OMHSAS. The materials appropriately identify OVR as the single-point-of-contact for employers who want to meet their workforce needs by hiring people with disabilities. This will build on the employer manual and encourage local team approaches to working with employers. The teams include representatives from OVR, local PDE agencies, and DHS-funded county-based human service agencies to support people with disabilities in securing employment and meeting the related needs of the employers. This is another example of collaboration and the benefits of workforce partners working together to address the needs of all job seekers, including individuals with disabilities.

E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.

This is a new category, so it was not included in the needs assessment for this reporting period. We have contracted with the Disability Institute of Temple University to conduct our next needs assessment. We have informed them of this new category, to ensure that it will be included in the next reporting period.

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

The results of the current CSNA identified chronic obstacles cited by CRPs that included lack of funding, understaffing and the need for minimum standards credentials for job coaches. Steps OVR will take in the coming months and years to address these needs will be to improve communication among partners, to encourage more CRPs to hire and train Community Work Incentive Counselors (CWICS) and to identify specific training required of CRP to build capacity of employment specialists to be successful in obtaining and maintain employment for people with disabilities. Additionally, identifying strategies and best practices to assist CRPs to transition from sheltered and/or segregated employment programs to competitive integrated employment services. All LWDBs now have OVR representation, and trainings have been updated for both systems' staff so an improved understanding of each other's resources and roles occurs. An updated Citizen Advisory Committee handbook has been published.

OVR created the Business Services and Outreach Division (BSOD). OVR already has a single point of contact model with placement staff in most offices, but with our new business services and outreach division, this concept is now being directed towards all placement services that serve people with disabilities in the commonwealth. BSOD personnel are now meeting with current and potential employers and partners (government and community) to detail OVR's services and how those services can benefit their agencies and organizations.

The merging of the customer satisfaction surveys of OVR and the Pennsylvania Rehabilitation Council (PaRC) was completed in July 2014. Both groups worked diligently to reword the survey to meet everyone's needs. In addition, the workgroup is now creating surveys for current OVR customers and for unsuccessfully closed cases. OVR staff is also looking at a better vehicle for delivering the surveys. Two online survey models and delivery systems are being examined to determine whether they meet the needs of OVR and the PaRC. In addition, a meeting has been scheduled with DHS, which now uses an online performance survey tool to collect information from their customers.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT .

This is a new category, so it was not included in the needs assessment for this reporting period. We have contracted with the Disability Institute of Temple University to conduct our next needs assessment. We have informed them of this new category, to ensure that it will be included in the next reporting period. Comprehensive Statewide Needs Assessment for FFYs 2016-2018

In conjunction with the PA Rehabilitation Council, OVR is required to conduct and interpret a Comprehensive Statewide Needs Assessment (CSNA) every three years. The CSNA is the basis for developing state plan goals, objectives and strategies. It is completed to identify needs for individuals with disabilities that can be addressed through the VR program. Our previous CSNA for FFY 2014-2016 was completed January 2015. For the next 3 year CSNA cycle OVR has chosen to implement a plan that will take a two tiered approach. Targeted actives will be addressed through year one of the current CSNA cycle are described in detail below. After the first year a new contracting process will be implemented to address the identified activities of the remaining two

years of the CSNA cycle. OVR has contracted with Temple University's Institute on Disabilities to assist OVR and the PA Rehabilitation Council to carry out the front line research, survey development, public forums, interpretation of results and report writing. The Temple staff are experienced research personnel very familiar with disability-related research and programming.

Many targeted activities planned for the next year were issues identified in the previous CSNA. Other activities were identified by OVR staff and agreed upon by the PaRC as important initiatives. Temple staff will coordinate their tasks with both OVR's Central Office staff and PaRC representatives. The following is an overview of the CSNA project for the next year.

1. Create and/or revise multiple customer satisfaction surveys for the agency. The surveys shall be prepared in a format for broad electronic distribution and electronic collection of data. • Revising and updating the customer satisfaction survey tool for status 26 closures; • Creating a customer satisfaction survey tool for status 28 closures; • Creating a customer satisfaction survey tool for open cases to assess specific services following their completion; and • Creating a transition-age youth survey to determine what is essential for a successful transition (what worked, what did not and what is still needed).

2. Gather information regarding the multifaceted programs of the Hiram G. Andrews Center (HGAC), including but not limited to: • Analyzing current educational programs (successful/unsuccessful, how to improve programs, relevancy with job opportunities in the community, potential new programs); • Comparing the quality and value of HGAC programs to other community based educational and rehabilitation programs; • Engaging the community to create a more accurate positive image of the HGAC; • Determining student satisfaction regarding all aspects of the HGAC; • Increasing referrals to the HGAC and increasing student census; • Increasing student graduation rate; and • Increasing student job placement rate.

3. Gather information from employers, VR professionals, community partners, etc. to increase competitive integrated employment for individuals with disabilities, especially those with the most significant disabilities, including but not limited to: • Increasing the knowledge of OVR services in the business and employment sector; • Identifying what is needed to increase competitive integrated employment for individuals with disabilities; • Engaging employers to affect an increase in the rate of employment for individuals with disabilities; • Identifying barriers to successful job search, job hire and job retention for individuals with disabilities; • Assisting employers in the hiring process of job candidates with disabilities; • Identifying post-employment supports employers need to retain employees with disabilities; • Determining employer-identified "good employee" work characteristics, i.e. soft skills; and • Identifying needs of older workers with disabilities.

4. Increase staff training targeted to providing consistent and equitable delivery of OVR information and services within district offices and across the commonwealth. • Identifying strategies to deliver equitable and consistent agency services throughout the commonwealth; • Enhancing counselor skills to better develop and provide individualized plans of service; • Identifying strategies to improve communication and follow-up services with customers; • Identifying strategies to shorten wait time for services; and • Identifying strategies to quickly refer job-ready candidates to employers for job vacancies.

K. ANNUAL ESTIMATES

(Formerly known as Attachment 4.11(b)). Describe:

1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

790,000 individuals in Pennsylvania are eligible for services as of the end of 2014 (Source: Cornell University Employment and Disability Institute using data from the Current Population Survey (CPS), which is conducted by the Census Bureau and the Bureau of Labor Statistics – http://www.disabilitystatistics.org/reports/cps.cfm?statistic=prevalence)

2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

A. THE VR PROGRAM;

59,000

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The Supported Employment Program: • Most Significantly Disabled: 1,800 • To be served in FFY 2016 with Title VI funds: 593 • Title VI funds to be allocated: $919,851

In FFY 2015 the number of SE customers served by OVR with title VI funds: • Total Number Served - Title VI Funds: 353 • Amount Spent - Title VI Funds $966,675.17 • Total Number Served under Age 25 - Title VI Funds: 336 • Amount Spent - Title VI Funds (under 25) $903,189.79 Additional SE customers served by OVR with title 1 funds: • Total Number Served - Title I Funds: 2,798 • Amount Spent - Title I Funds: $6,473,740.30 • Total Number Served under Age 25 - Title I Funds: 760 • Amount Spent - Title I Funds (under 25): $1,815,767.32

C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

• Each priority category, if under an order of selection. o Most Significantly Disabled: 53,250 o Significantly Disabled: 179 o Not Significantly Disabled: 2

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

33 cases

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

Based on actual FFY 2014 figures, OVR’s outcome and service goals under the Order of Selection are projected as follows for FFY 2016: • For the Most Significantly Disabled category, the number accepted is expected to be 16,000, while the number served will be 55,000. The number rehabilitated will be 8,575, of which 8,300 will be the number rehabilitated into the competitive labor market. The total cost of services for FFY 2016 is expected to be $64,982,277, which will be revised following notification of the FFY 2016 Appropriation. • For the Significantly Disabled category, the number accepted is expected to be 25 (newly accepted, but placed on a waiting list) while the

number served will be 15. The number rehabilitated will be 3, of which 2 will be the number rehabilitated into the competitive labor market. The total cost of services for FFY 2016 is expected to be $17,722, which will be revised following notification of the FFY 2016 Appropriation. • For the Non-Significantly Disabled category, the number accepted is expected to be 0 (newly accepted, but placed on a waiting list) while the number served will be 0. The cost for FFY 2016 is expected to be 0.

L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Any projections, program continuations, etc. in this Attachment are subject to the availability of supporting funding in the Plan year. Goals were developed jointly with the PaRC on December 8, 2014 and jointly agreed to revisions.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

Goal 1: Increase Employment Opportunities for Individuals with Disabilities

1. Expand the availability of apprenticeships, internships and on the job training (OJT) for individuals with disabilities.

2. Partner with the Bureau of Workforce Partnership and Operations (BWPO) to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.

3. Create and expand interagency agreements between OVR and local Career and Technology Centers and other community–based organizations.

Goal 2: Increase/Improve Transition Services for Students with Disabilities

1. Increase pre–employment transition services for students with disabilities.

2. Increase opportunities for students to gain workplace skills and community–integrated work experiences.

3. Enhance collaborative relationships with DHS, PDE and higher education.

4. Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.

5. Research best practices for the implementation of peer mentoring opportunities.

Goal 3: Increase community education and outreach.

1. Work with the PaRC to share best practices and outreach methods to increase participation in the Citizens Advisory Committee meetings.

2. Continue to grow OVR's social media presence.

3. Educate staff on accessibility and technology based upon universal design principles.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

Comprehensive Statewide Needs Assessment for FFYs 2015–2017

In conjunction with the PA Rehabilitation Council, OVR is required to conduct and interpret a Comprehensive Statewide Needs Assessment (CSNA) every three years. The CSNA is the basis for developing state plan goals, objectives and strategies. It is completed to identify needs for individuals with disabilities that can be addressed through the VR program. Our previous CSNA was completed January 2015 and the next cycle is effective July 2015 and will continue through June 30, 2016. After that date a new contracting process will be implemented to address the activities of the remaining two–year cycle. OVR has contracted with Temple University's Institute on Disabilities to assist OVR and the PA Rehabilitation Council to carry out the front line research, survey development, public forums, interpretation of results and report writing. The Temple staff are experienced research personnel very familiar with disability–related research and programming.

Many targeted activities planned for the next year were issues identified in the previous CSNA. Other activities were identified by OVR staff and agreed upon by the PaRC as important initiatives. Temple staff will coordinate their tasks with both OVR's Central Office staff and PaRC representatives. The following is an overview of the CSNA project for the next year.

1. Create and/or revise multiple customer satisfaction surveys for the agency. The surveys shall be prepared in a format for broad electronic distribution and electronic collection of data.

a. Revising and updating the customer satisfaction survey tool for status 26 closures;

b. Creating a customer satisfaction survey tool for status 28 closures;

c. Creating a customer satisfaction survey tool for open cases to assess specific services following their completion; and

d. Creating a transition–age youth survey to determine what is essential for a successful transition (what worked, what did not and what is still needed).

2. Gather information regarding the multifaceted programs of the Hiram G. Andrews Center (HGAC), including but not limited to:

a. Analyzing current educational programs (successful/unsuccessful, how to improve programs, relevancy with job opportunities in the community, potential new programs);

b. Comparing the quality and value of HGAC programs to other community based educational and rehabilitation programs;

c. Engaging the community to create a more accurate positive image of the HGAC;

d. Determining student satisfaction regarding all aspects of the HGAC;

e. Increasing referrals to the HGAC and increasing student census;

f. Increasing student graduation rate; and

g. Increasing student job placement rate.

3. Gather information from employers, VR professionals, community partners, etc. to increase competitive integrated employment for individuals with disabilities, especially those with the most significant disabilities, including but not limited to:

a. Increasing the knowledge of OVR services in the business and employment sector;

b. Identifying what is needed to increase competitive integrated employment for individuals with disabilities;

c. Engaging employers to effect an increase in the rate of employment for individuals with disabilities;

d. Identifying barriers to successful job search, job hire and job retention for individuals with disabilities;

e. Assisting employers in the hiring process of job candidates with disabilities;

f. Identifying post–employment supports employers need to retain employees with disabilities;

g. Determining employer–identified “good employee” work characteristics, i.e. soft skills; and

h. Identifying needs of older workers with disabilities.

4. Increase staff training targeted to providing consistent and equitable delivery of OVR information and services within district offices and across the commonwealth.

a. Identifying strategies to deliver equitable and consistent agency services throughout the commonwealth;

b. Enhancing counselor skills to better develop and provide individualized plans of service;

c. Identifying strategies to improve communication and follow–up services with customers;

d. Identifying strategies to shorten wait time for services; and

e. Identifying strategies to quickly refer job–ready candidates to employers for job vacancies.

B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

These are new performance indicators for the VR program and because there is insufficient or no historical data available the first two years of the plan a baseline will be established based on the actual performance that will be reported during this time period.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Recommendations and input from Defining Positive Customer Service in the State Vocational Rehabilitation System report, a project initiated by the PaRC, were used in addition to findings and recommendations from monitoring activities.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

PRIORITY OF CATEGORIES TO RECEIVE VR SERVICES UNDER THE ORDER

First Priority: Most Significantly Disabled (MSD)

Second Priority: Significantly Disabled (SD)

Third Priority: Non–Significantly Disabled (NSD)

DESCRIPTION OF PRIORITY CATEGORIES

First Priority: Most Significantly Disabled (MSD)

• The physical, mental, or sensory impairment(s) must seriously limit three or more of the individual’s functional capacities; and

• The individual must be expected to require two or more vocational rehabilitation services that are expected to last six months from the date of the Individualized Plan for Employment (IPE) or be needed on an ongoing basis to reduce an impediment to employment.

Second Priority: Significantly Disabled (SD)

• The physical, mental, or sensory impairment(s) must seriously limit one or more of the individual's functional capacities; and

• The individual must be expected to require multiple vocational rehabilitation services that are expected to last six months from the date of the Individualized Plan for Employment (IPE) or be needed on an ongoing basis to reduce an impediment to employment.

Third Priority: Non–Significantly Disabled (NSD)

• The individual has a physical, mental, or sensory impairment that does not meet the definition for MSD or SD.

B. THE JUSTIFICATION FOR THE ORDER.

Because OVR does not believe it will be able to serve all eligible individuals with the available resources, it has adopted an Order of Selection.

C. THE SERVICE AND OUTCOME GOALS.

Given the projections of flat funding at both the Federal and State level, OVR will strive to maintain current service levels. As of December 1, 2014, OVR had a waiting list of about 25 customers whose severity of disability was either classified in the second or third priority. Based on actual FFY 2014 figures, OVR's outcome and service goals under the Order of Selection are projected as follows for FFY 2016:

• For the Most Significantly Disabled category, the number accepted is expected to be 16,000, while the number served will be 55,000. The number rehabilitated will be 8,575, of which 8,300 will be the number rehabilitated into the competitive labor market. The total cost of services for FFY 2016 is expected to be $64,982,277, which will be revised following notification of the FFY 2016 Appropriation.

• For the Significantly Disabled category, the number accepted is expected to be 25 (newly accepted, but placed on a waiting list) while the number served will be 15. The number rehabilitated will be 3, of which 2 will be the number rehabilitated into the competitive labor market. The total cost of services for FFY 2016 is expected to be $17,722, which will be revised following notification of the FFY 2016 Appropriation.

• For the Non–Significantly Disabled category, the number accepted is expected to be 0 (newly accepted, but placed on a waiting list) while the number served will be 0. The cost for FFY 2016 is expected to be 0.

In total, the number accepted is expected to be 16,000, while the number served will be 55,015. The number rehabilitated will be 8,578, of which 8,302 will be the number rehabilitated into the

competitive labor market. The service cost for FFY 2016 is expected to be $65,000,000, which will be revised following notification of the FFY 2016 Appropriation.

Throughout the year, OVR senior management will evaluate the agency's available resources on a regular basis to serve individuals with disabilities considered to be Significant Disability (SD). If resources are available, the OVR District Offices will be informed that they can move individuals from waiting into an active status with OVR. Persons on the SD level will be served according to their date of application. If no resources are available, individuals will remain on the SD list until the next re–evaluation.

D. THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

The time frame in which goals are to be achieved is approximately 30 months for both MSD and SD priority of service categories.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

In keeping with federal mandates, it is the policy of OVR to operate on an Order of Selection when the agency is unable to provide services to all eligible individuals in the same state who apply for services. The Order of Selection in Pennsylvania gives priority first to individuals with the Most Significant Disabilities (MSD); secondly, to individuals with Significant Disabilities (SD); and third to individuals with Non–Significant Disabilities (NSD). All new applicants for services must be notified about the Order of Selection. Significance of disability is defined based upon the presence of functional capacities and the requirement of multiple vocational rehabilitation services, defined as two or more services that are expected to last 6 months from the date of the Individualized Plan for Employment (IPE) or be needed on an ongoing basis to reduce an impediment to employment.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

After dialogue with the Pennsylvania Rehabilitation Council and the State Board of Vocational Rehabilitation, OVR has determined that pending a state budget increase, if granted in FY 2015-16 and maintained in FY 2016-17, then OVR will consider the agency's option to serve eligible individuals with disabilities outside the current order of selection who have an immediate need for equipment or services to maintain employment. If no additional funding is received, then OVR will maintain its current Order of Selection while continuing to evaluate the agency's available resources on a regular basis. Therefore, OVR has elected not to serve eligible individuals outside the current order of selection who require VR services or equipment to maintain employment unless OVR amends its State plan prior to the 2-year modification.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

OVR will use Title VI Funds to provide Supported Employment (SE) services to customers throughout the commonwealth. Services are provided by way of contracts with community based rehabilitation providers using an individualized, performance-based job coaching model. Title I Funds will be used to provide SE services after Title VI Funds have been exhausted.

SE services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. OVR has a number of changes planned for individuals receiving SE services, such as expanding Discovery and Customized Employment pilots. The following improvements listed are intended to be considered OVR goals for title VI funds. For example, OVR is revising its SE policy that will consider providing more intensive evaluation throughout the life of a case to ensure that services will be provided to customers most in need. Increasing communication among VR partners is another area under consideration. The SE policy revision will focus on achieving a higher level of long-term stability as part of successful employment outcomes through SE funding. Title I Funds will be used to provide Supported Employment services after Title VI Funds have been exhausted. Another goal for title VI funds includes OVR plans to continue to expand SE services for underserved populations. This includes providing quality services to individuals with the most significant disabilities, to increase successful outcomes for transition-aged youth, and to ensure accessibility of services for all potential customers. OVR plans to enhance service coordination with partner agencies such as the Office of Developmental Programs, the Office of Mental Health and Substance Abuse Services and the Office of Long Term Living. These agencies provide the necessary long-term supports needed to ensure the employment success of the individual with a disability.

2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

OVR will use Title VI Funds to provide Supported Employment (SE) services to customers throughout the commonwealth. Services are provided by way of contracts with community based rehabilitation providers using an individualized, performance-based job coaching model. Title I Funds will be used to provide Supported Employment services after Title VI Funds have been exhausted.

SE services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. It is anticipated that approximately 6,900 Pennsylvanians with the most significant disabilities will receive SE services in FFY 2015. Of this number, an anticipated 850 individuals will receive services funded out of the Title VI, Part B Funds projected for distribution to Pennsylvania in FFY 2016.

OVR is preparing to revise its SE policy during FFY 2015. OVR will consider providing more intensive evaluation throughout the life of a case to ensure that services will be provided to customers most in need. Increasing communication among VR partners is another area under consideration. The SE policy revision will focus on achieving a higher level of long-term stability as part of successful employment outcomes through SE funding.

OVR plans to continue to expand SE services for underserved populations. This includes providing quality services to individuals with the most significant disabilities, to increase successful outcomes for transition-aged youth, and to ensure accessibility of services for all potential customers. OVR plans to enhance OVR partnerships with provider agencies such as the Office of Developmental Programs, the Office of Mental Health and Substance Abuse Services and the Office of Long Term Living. These agencies provide the necessary long-term supports needed to ensure the employment success of the individual with a disability.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

OVR will use Title VI Funds to provide Supported Employment (SE) services to customers throughout the commonwealth. Services are provided by way of contracts with community based rehabilitation providers using an individualized, performance-based job coaching model. Title I Funds will be used to provide Supported Employment services after Title VI Funds have been exhausted.

SE services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. It is anticipated that approximately 6,900 Pennsylvanians with the most significant disabilities will receive SE services in FFY 2015. Of this number, an anticipated 850 individuals will receive services funded out of the Title VI Funds projected for distribution to Pennsylvania in FFY 2016.

OVR is preparing to revise its SE policy during FFY 2015. OVR will consider providing more intensive evaluation throughout the life of a case to ensure that services will be provided to customers most in need. Increasing communication among VR partners is another area under consideration. The SE policy revision will focus on achieving a higher level of long-term stability as part of successful employment outcomes through SE funding.

OVR plans to continue to expand SE services for underserved populations. This includes providing quality services to individuals with the most significant disabilities, to increase successful outcomes for transition-aged youth, and to ensure accessibility of services for all potential customers. OVR plans to enhance OVR partnerships with provider agencies such as the Office of Developmental Programs, the Office of Mental Health and Substance Abuse Services and the Office of Long Term Living. These agencies provide the necessary long-term supports needed to ensure the employment success of the individual with a disability.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

The 2016 state plan will need to focus on the implementation of WIOA, which reauthorizes the Rehabilitation Act in Title IV. The Act calls for increased emphasis on services to transition–aged youth, business services, and collaborations with other agencies and partners. This emphasis will result in expanded and improved services and outcomes for individuals with disabilities.

The concept of pre– employment transition services is introduced through WIOA. OVR will be required to perform the following activities under pre–employment transition services:

1) Job exploration counseling;

2) Work–based learning experiences, which may include in school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible;

3) Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;

4) Workplace readiness training to develop social skills and independent living; and

5) Instruction in self–advocacy, which may include peer mentoring.

The provision of the above services will result in reaching students earlier to maximize their educational opportunities and best plan for transition to employment or postsecondary educational opportunities.

The second area of major emphasis in WIOA is business services. OVR has started to plan and implement a new Business Services Division with the following goals:

• Provide singularity of focus and resources to better understand and respond to business needs in a dual customer service model (talent supply and demand side).

• Make OVR the lead state agency and preferred resource for businesses or organizations to recruit and on–board people with disabilities through a single point of contact (SPOC) model.

• Enhance collaboration and partnership with the PA Business Leadership Network (PA BLN), Chambers, SHRM, and other business organizations to make connections with business leaders to promote hiring practices that enable individuals with disabilities to enter and succeed in the workplace.

• Promote agency–wide consistency and quality of business services, communication and stakeholder outreach through training, resources, collaboration, and development of innovative web, social media and print–based branding.

• Increase alignment with the Council of State Administrators of Vocational Rehabilitation (CSAVR) VR–National Employment Team (VR–NET) through the Business Services Division offering agency–wide consistency in delivery of high quality business services utilizing emerging practices in an evolving, national VR community of practice.

• Significantly increase the availability and number of successful agency–wide career employment outcomes or appropriate self–employment for all OVR consumer customers in emerging occupations, business and labor markets.

We will have one business services representative in each OVR District Office who will work as part of the business services team to focus on the above objectives.

The third major focus in WIOA is on collaboration. OVR will continue to develop, initiate or expand upon collaborative relationships with community stakeholders and partners and other state agencies to promote and expand opportunities for individuals with disabilities.

Finally, WIOA emphasizes the importance of Assistive or Rehabilitative Technology. OVR has hired a Business Analyst to serve as an Assistive Technology Specialist to assist staff with the maximization of assistive technology and how it can assist OVR customers to achieve their educational and employment goals. We are also committed to expanding the capacity to serve more customers and provide technical assistance regarding available assistive technology through a tele–rehabilitation pilot with the Center for Assistive and Rehabilitative Technology (CART) and the University of Pittsburgh located at our comprehensive rehabilitation center, Hiram G. Andrews Center (HGAC).

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

The Center for Assistive and Rehabilitative Technology (CART) at the Hiram G. Andrews Center (HGAC) in Johnstown, PA is an available assistive technology (AT) resource to OVR customers throughout the commonwealth. Highly trained professionals evaluate and support people in the following areas of assistive technology: positioning and mobility, computer access, augmentative communication, environmental controls, driver training, vehicle modification, devices for activities of daily living (ADL), devices for visual and/or auditory impairment and home and work modifications. The Learning Technology Program (LTP) assesses student's needs in the classroom and trains them in the use of assistive technology, if necessary.

Pennsylvania's Assistive Technology Lending Library provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post–secondary education, or similar purposes). The centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location. The regional subcontractors of PIAT, the state's AT Act program, facilitate the selection, borrowing, and use of these devices across the state.

Specific AT policies include: the Home Modification Policy, the Vehicle Modification Policy and the Farming and Agriculture Rehabilitation Management (FARM) policy. These policies provide a wide range of AT evaluation and services detailed to meet the needs of OVR customers in removing environmental barriers to employment.

A separate policy related to the provision of AT services and devices has been identified as a needed guide for OVR to address the increasing demand for “off the shelf” technology to provide parameters to meet the AT needs of VR customers in a cost–effective and consistent manner. The planning for this policy will likely take place in 2015.

The VR customer is provided AT services and devices are provided as the above listed resources are utilized by the VR counselor and customer throughout the rehabilitation process. Assessment always precedes use of any AT device or service to ensure provision of such items is appropriate and timely to meet the vocational needs of the individual.

OVR uses a number of vendors who are Rehabilitation Engineers and Assistive Technology Specialists on a "fee–for–service" basis throughout the commonwealth. Most providers can travel to the OVR customer’s home and/or worksite to provide AT evaluation and training services. Staff from HGAC’s CART will also travel to various parts of the commonwealth to assess an OVR customer’s AT needs as well as to facilitate training when appropriate.

In accordance with OVR’s policies, OVR purchases AT devices and services to support its customers in their vocational goals. OVR also provides information and referral services regarding other resources when the agency is unable to provide funding for AT devices and services. OVR’s Statewide AT Coordinator regularly distributes information electronically to OVR’s District Offices regarding non–VR funded AT services, programs, and resources.

OVR collaborates with Pennsylvania’s Initiative on Assistive Technology (PIAT) at the Institute on Disabilities at Temple University to participate in training, maintain the PATLL, and develop AT resources for Pennsylvanians with disabilities.

Low interest loans are available through the Pennsylvania Assistive Technology Foundation (PATF) to customers who have a disability or any older or state resident who has need for AT.

OVR also collaborates with BWPO via the PA CareerLink® centers to better assist veterans who have disabilities in obtaining AT to remove barriers in locating and maintaining employment. The Statewide Veterans Coordinator attends PA Cares meetings monthly in order to learn about assistive technology/training programs offered by various community and state agencies and higher education institutions. This information is transmitted statewide to OVR Veteran Coordinators and Veteran Counselors in each field office who provide AT equipment and training to OVR customers who are veterans with disabilities.

OVR has collaborated with Penn State’s AgrAbility Program and the Department of Agriculture in developing a policy to address the rehabilitation needs of farmers/ranchers with disabilities. This policy is known as Farming and Agriculture Rehabilitation Management (F.A.R.M.) which is designed to assist farmers with disabilities. VR counselors, with technical assistance and guidance from Pennsylvania’s AgrAbility Program, are able to assess the rehabilitation needs of farmers/ranchers with disabilities in order to provide the specialized rehabilitative and assistive technologies they may need to maintain their employment.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

OVR District Office staff provides outreach activities designed to educate and inform individuals with disabilities who are minorities, including those with the most significant disabilities. Each District Office will develop a forward thinking strategy of outreach for the year. Outreach activities will include information sessions regarding OVR services and how to access such services, including presentations where individuals who are minorities are the target audience. Some of these will include presentations at community agencies that target the Latino population and participation in Asian–American events.

OVR has recently awarded, through an Innovation and Expansion project, the development of an Industry Integrated Employment and Training Program designed specifically for Latino Adults with Significant Disabilities in Berks County. This project will expand services to this targeted population.

OVR will continue to identify and expand key documentation and literature in Spanish, and further, will continue the use of language line for more effective communication with customers from different ethnic backgrounds to overcome language barriers.

OVR, in collaboration with the Office for the Deaf and Hard of Hearing (ODHH) and the Statewide Independent Living Council (SILC) developed a Support Service Provider Initiative (SSP) for individuals who are deaf/blind. The purpose is to expand opportunities for individuals who are deaf blind in accessing educational, community and employment services. This collaborative effort will include the centers for independent living and the Helen Keller National Center. This significantly unserved population will now greatly benefit from this crucial service to promote independence.

OVR District Office staff provides outreach activities designed to educate and inform individuals with disabilities who are unserved or underserved. These targeted outreach activities will be designed to provide information about accessing OVR services. Early Reach Coordinators (ERC) will be conducting similar activities in schools to reach unserved or underserved students.

As a result of Section 511 in the re–authorization of the Rehabilitation Act in WIOA, OVR will be required to evaluate an individual with a disability who is age 24 or younger prior to them entering sub–minimum wage work. This will ensure this group of underserved youth has full opportunities to enter community integrated competitive employment.

Neither a local educational agency, as defined in § 397.5(b)(1), nor a State educational agency, as defined in§ 397.5(b)(2), may enter into a contract or other arrangement with an entity, as defined in § 397.5(d), for the purpose of operating a program under which a youth with a disability is engaged in subminimum wage employment. OVR is developing standard procedures to meet the requirements of this section that state that no entity may compensate an individual with a disability who is age 24 or younger at a wage referred to as subminimum wage until the individual has received pre–employment transition services and has applied for vocational rehabilitation services. For individuals who are already in the subminimum wage setting as of July 22, 2016, OVR will be providing career counseling. In addition, OVR is conducting outreach to local education agencies in order to educate them about the proposed regulations regarding the use of subminimum wage and OVR efforts that focus on:

1. Presenting information at transition coordinating council meetings, special education administrators' meetings, statewide webinars with PaTTAN, and at the Special Education Advisory Panel meetings.

2. Developing alternate service delivery models for individuals with significant disabilities who may have traditionally entered into subminimum wage employment.

3. Developing innovative and collaborative programs and services such as Discovery and Customized Employment as well as funding for Comprehensive Transition Programs that will help divert individuals away from subminimum wage employment.

4. Revising the Supported Employment policy to ensure that these particular services truly meet the needs of the population it was intended to serve and to increase job stability and longevity in a competitive integrated environment.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES).

OVR will continue to develop the activities performed by Early Reach Coordinators to reach students with disabilities and their families earlier in the transition process (age 14–16). The Early Reach Initiative will be expanded in designated District Offices throughout the commonwealth due to increased demand. OVR will continue to explore opportunities to enter into Interagency Agreements and local Letters of Understanding to develop, expand and deliver pre–employment transition services and to update our statewide MOU to ensure that pre–employment transition services and general "School to Work" Transition services are delivered in an effective and consistent manner. OVR will continue to develop and expand innovative service delivery models such as Discovery, Customized Employment, Project SEARCH and Project PAS to ensure that students with disabilities are able to successfully transition from school to postsecondary life.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

In response to WIOA, OVR is planning to pilot customized employment (CE) scenarios that involve the use of supported employment (SE) services. This would be an improvement to community rehabilitation programs as providers would be required to be certified in order to provide CE services. This blend of CE and SE is intended to improve employment outcomes for individuals with the most significant disabilities (MSD). The OVR SE policy is in the process of revision to reflect the new WIOA regulations. We hope to improve community rehabilitation program (CRP) outcomes for those with the MSD by increasing communication among partners and providing supports for as long as needed and required.

Letters of Understanding (LOUs) will continue to be developed with new providers in an effort to offer an array of service choices for OVR customers throughout the state. OVR is in the process of renewing existing LOUs. This involves a review of overall quality of services and of past OVR

customer success. As provision of quality customer service is important to OVR, we are developing a plan that will monitor all OVR providers, not just those with LOUs.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

OVR reviews the performance standards and indicators monthly. As an agency we constantly strive to meet or exceed the standards and indicators through training, policy development, and the addition or creation of new and innovative programs that will benefit our customers. We are also going through an extensive CSNA that will help guide us regarding service provision and to address system gaps to ensure that as many positive outcomes are achieved as possible. We are also exploring services such as customized employment and implementing interagency agreements that will assist with federal match generation to serve additional customers. OVR will continue to monitor the standards and indicators and incorporate stakeholder input into our program to ensure a cycle of constant reflection and program improvement.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

Local OVR Veterans' Counselors and Coordinators continue to work collaboratively with the Local Veterans Employment Representatives (LVER) and Disabled Veterans Outreach Program Specialists (DVOPS) within the PA CareerLink® system to coordinate services for veterans with disabilities. OVR regularly participates in the PA CARES Consortium with other agency partners including BWPO and the VA Vocational Rehabilitation & Education (VA–VRE) Program to ensure access to services to all veterans through information and referral services. In addition, OVR has sponsored employees in Forensic Training related to Veterans with mental health, traumatic brain injury and/or substance abuse issues.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

Any projections, program continuations, etc. in this Attachment are subject to the availability of supporting funding in the Plan year. Goals were developed jointly with the PaRC on December 8, 2014 and jointly agreed to revisions.

Goal 1: Increase Employment Opportunities for People with Disabilities

1. Expand the availability of apprenticeships, internships and on the job training (OJT) for people with disabilities.

OVR is planning to increase workplace skill and employment opportunities for Adults and Youth through several new initiatives. In 2014 OVR initiated a wage reimbursement On–the–Job Training (OJT) targeting youth 25 years of age or younger who enter active plan status. This initiative will help youth gain work experience prior to career placement and during the process of rehabilitation while they are in secondary or postsecondary education. This involves OVR reimbursing wages of

students while they participate in full– or part–time, limited seasonal or summer employment, internships or apprenticeships. OVR also initiated a thirty day 100 percent wage reimbursed OJT for all ages of OVR consumer customers. This initiative may help offset a small– to mid–sized business or organizations costs in hiring and on–boarding additional workforce talent.

BSOD will work closely with the Business Services Committee and local Eastern and Western combined Agency District Office Business Services teams to develop apprenticeship, internship and paid time–limited job experiences through use of on–the–job wage reimbursement agreements with both public and private employers and local trade unions. Outreach will be organized by development of combined bureau District Office regional plans with involvement of Eastern and Western Business Outreach Specialists. Combined bureau District Office Single Points of Contact (SPOC's) will use an Excel spreadsheet to track local employer contacts that use an OJT as part of employment experience and on–boarding of permanent new hires.

2. Partner with the Bureau of Workforce Partnership and Operations (BWPO) to ensure programmatic and physical accessibility of the PA CareerLink® for equal access for people with disabilities.

OVR will analyze WIOA and implement a strategy for partnership with BWPO that satisfies all aspects of its language. OVR's strategy for partnership will focus on increased awareness of individuals with disabilities and the vocational rehabilitation process. This will ensure that individuals with disabilities receive consistent and relevant information, services and referrals within BWPO's infrastructure. OVR must also ensure that people with disabilities have unabated physical and attitudinal access to the critical services that BWPO offers, including those found within the PA CareerLink® centers. OVR strives for increased collaboration and improved communication strategies between our two agencies.

3. Create and expand interagency agreements between OVR and local Career and Technology Centers and other community–based organizations.

Effective October 1, 2014 OVR entered into an interagency agreement with the Berks County Career & Technology Center (CTC) to jointly fund two positions, a School–to–Work Coordinator and a Job Trainer who will serve OVR eligible youth with disabilities in order to increase and improve their community–integrated, competitive employment outcomes. If successful, this model will be replicated at other CTCs of which there are 85 across the commonwealth. Progress monitoring is being conducted and outcomes will be reported at the 2015 PA Community of Practice on Transition Conference as well as annual conferences held for career and technology education professionals.

Another interagency agreement with Greene County Human Services and Intermediate Unit 1 will jointly fund one School–to–Work Coordinator position that will be dedicated to serving OVR eligible youth with intellectual disabilities who are between the ages of 14 and 21 who are enrolled in local education agencies within Greene County. The agreement targets more effective vocational evaluation, increased service coordination, and interagency collaboration with the goal of achieving increased and improved community–integrated, competitive employment outcomes.

Goal 2: Increase/Improve Transition Services for Students with Disabilities

1. Increase pre–employment transition services for students with disabilities.

The term “pre–employment transition service” is new in WIOA. OVR is well positioned to respond to expanding pre–employment transition services in Pennsylvania as defined in WIOA. OVR continues to implement the following initiatives that focus on services needed by transitioning youth with disabilities in Pennsylvania:

• Annual Transition Conference planning and staff participation • Designated Transition VR Counselors

• Transition Coordinating Council participation

• Early Reach Coordinators in each district office

• Project Search

• Project PAS

• IEP staff participation for appropriate students

• Transition Policy and Guidelines for staff

• Jobs for All – On the Job Training

• Business Services Representatives to assist with job placement

• Access College – Employment Success grant to D.R.E.A.M. Partnership

• Discovery Pilot in three district offices

Comprehensive efforts to implement WIOA and the corresponding “pre–employment transition services” as outlined in the new law will be determined by the regulations as promulgated by the Rehabilitation Services Administration.

2. Increase opportunities for students to gain workplace skills and community–integrated work experiences.

OVR continues to increase workplace skill and employment opportunities for youth through several new initiatives. As discussed previously, in 2014, OVR initiated a wage reimbursement On–the–Job Training (OJT) program targeting youth 25 years of age or younger who enter active plan status. This initiative will help youth gain work experience prior to career placement and during the process of rehabilitation while they are in secondary or postsecondary education. OVR will reimburse wages of students while they participate in full– or part–time, limited seasonal or summer employment, internships or apprenticeships. The Jobs for All– OJT can assist employers to hire and provide employment opportunities for OVR transition customers while they are still in school to assist them in building their workforce talent and experience. The key to the success of the Jobs for All – OJT will be flexibility with business and industry in meeting their unique needs while offering youth a chance to join the workforce for a time–limited, paid work experience. Ultimately, we hope that the soft skills learned, the coordination of transportation and technology to get to and from work, the performance of job tasks, and the value of having paid, real work experiences on their resumes will enable young

people with disabilities to eventually achieve an employment outcome in their IPE targeted career goal.

OVR has also developed two blended funding interagency agreements, Work Partners with Berks Career and Technology Center and Greene County Human Services and Intermediate Unit 1 to jointly fund newly created staff positions at the respective sites. At Work Partners, a School to Work Coordinator and job coach will work with OVR eligible Service Occupation students to develop workplace skills via career instruction and to develop practicum and internship work based experiences leading to permanent, community–integrated, competitive employment. At Greene County, a School to Work Coordinator position was developed to provide OVR eligible transition aged youth with disabilities various work–based educational experiences, on–the–job support, independent living skills and community involvement oriented toward competitive integrated employment.

3. Enhance collaborative relationships with the Department of Human Services (DHS), Department of Education (PDE) and higher education.

OVR has regular meetings and conference calls with our partners at DHS and PDE. OVR participates in educational opportunities through PA Training and Technical Assistance Network (PATTAN) both by providing training on relevant OVR topics and by attending trainings relevant to OVR's Transition Program. OVR works with postsecondary education entities by supporting and promoting the Promoting Academic Success (PAS) program. OVR works closely with the Intermediate Units on Project SEARCH. The Office of Developmental Programs is becoming increasingly involved with Project SEARCH. OVR has been an active participant in the Office of Developmental Programs "Futures Planning." OVR maintains these relationships by recommending and attending professional conferences with training relevant for all collaborating agencies.

OVR representatives regularly attend the Special Education Advisory Panel, Pennsylvania Developmental Disabilities Council, and the Pennsylvania Employment First State Leadership Mentoring Project with members of other agencies in order to collaborate with agency partners in order to coordinate services to mutual customers.

OVR issued a "Joint Bulletin" with the Office of Developmental Programs to better direct the referral process as well as to provide direction on the requirements for documentation by the supports coordination organizations.

OVR has issued funding to the D.R.E.A.M. Partnership from the Access College– Employment Success (ACES) grant to develop and implement college certificate programs for persons with intellectual disabilities. The grant stipulates that the programs developed will focus on employment, following the Transition and Post–Secondary Programs for Students with Intellectual Disabilities (TPSID) model and utilizing the Think College guidelines. OVR is collaborating with other state VR programs to seek guidance on the development of agency policy on the provision of financial aid to such programs.

4. Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.

The Transitional Vocational Initiative summer program is now being expanded to three weeks. The third additional week will involve students actually working in jobs in the community that they shadowed the prior week.

5. Research best practices for the implementation of peer mentoring opportunities.

OVR will collaborate with the Centers for Independent Living (CILs) to identify service gaps in the area of peer mentoring, specifically as it relates to transition services for young adults with disabilities. Once specific need areas are identified, OVR will research best practices for transition youth peer mentoring.

Goal 3: Increase community education and outreach.

1. Work with the PaRC to share best practices and outreach methods to increase participation in the Citizens Advisory Committee (CAC) meetings.

OVR is very interested in receiving input and welcomes advice from the PaRC on how to increase participation in the district office CACs. In addition, OVR intends to share district office CAC best practices at statewide and regional meetings that bring together district office management staff. District office CAC minutes are shared with the PaRC for its reference and are available to identify promising practices. However, the intent of the district office CAC is to be locally–run, consumer–driven, and responsive to local CAC member recommendations. Therefore, each CAC is autonomous and develops strategic planning that is relevant to local concerns, issues and priorities, with input from OVR local management. OVR supports sharing of CAC information while preserving each CAC's autonomy to develop local goals.

2. Continue to grow OVR's social media presence.

OVR has already connected with 340 followers on LinkedIn and 580 on Facebook as part of our agency's social media initiative, which was launched in October 2013. OVR has been delivering content on a more frequent basis since the platforms became available. Information is gathered from local district offices, statewide events and national sources. Social media posts have highlighted OVR–sponsored activities and events, agency accomplishments, customer success stories and other information pertinent to our consumer and business customers. OVR will increase and refine our social media presence moving forward, with a continued emphasis on delivering quality content and relevant information to all of our customers in a timely manner. OVR will continue to evolve with the changing social media landscape and adapt our strategies, as necessary, in order to ensure that the material we provide is accessible and impactful. OVR has also added an Administrative Office position to the Business Services and Outreach Division, which will focus on direct marketing, branding and public outreach using print, web applications and social media. This new position will allow a dedicated staff member with experience and expertise in the field to focus on the proper evolution and growth of OVR's social media strategy.

3. Educate staff on accessibility and technology based upon universal design principles.

OVR is committed to ensuring that staff members utilizing assistive technology (AT) are knowledgeable and proficient in its use. AT utilized by staff include screen readers, screen magnifiers, speech recognition software, and more. OVR offers trainings, presentations, conferences, and customized training materials to staff to ensure the highest level of proficiency. OVR employs staff who provide direct instruction to individuals with a broad range of disabilities, and through the above mentioned offerings, staff can gain information and experience used during direct instruction. Additionally, OVR has AT coordinators in Central Office and in each district office to be an educational resource to field staff, partners, customers and their families. These resources can assist staff and customers to use AT that is not limited in design, but have longer use and more

effective use due to its universal design. The Center for Assistive Rehabilitation Technology Lending Library at the Hiram G Andrews Center is another educational resource which OVR staff can access to learn about AT universal design and incorporate this knowledge in AT recommendations to the OVR customer.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

OVR continues to support innovation and expansion approaches through ongoing Letters of Understanding (LOU) that are developed between community rehabilitation providers and OVR to support the expansion of services to individuals with disabilities, particularly individuals with the most significant disabilities. This allows us to constantly evaluate and develop new service activities that bring about innovative approaches to serving customers with disabilities more effectively.

OVR continually considers the development of new and emerging services with existing community rehabilitation providers to meet the needs of our customers. As funds are available, OVR will develop a Request for Quote (RFQ) for Innovation and Expansion Projects to provide new strategies and programs to improve employment outcomes for individuals with the most significant disabilities. These projects will target expansion of employment services into rural and underserved counties, job readiness and job placement of customers with the most significant disabilities who have traditionally been underserved, transition services for students with disabilities, pre–employment transition services for students with disabilities, replication of Project SEARCH for students or youth with disabilities, and/or the development of Industry Integrated Employment programs, as well as other innovative strategies identified by local OVR staff. OVR anticipates that potential contracts would generally be up to $150,000 for the initial project year. Higher contract awards could be accepted for proposals of exceptional activity, as funds are available.

Innovation and Expansion funds will be used to support the funding of the State Rehabilitation Council.

Innovation and Expansion funds have not been used to support the Statewide Independent Living Council's resource plan as other sources of funding have been available. Centers for Independent Living have received funds for innovation and expansion projects in the past.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

OVR continues to collaborate with other supported employment (SE) funding sources to overcome issues of dwindling resources. OVR participates in a cross–agency workgroup with the Office of Developmental Programs (ODP), the Office of Mental Health and Substance Abuse Services (OMHSAS), and the Office of Long–Term Living (OLTL) to address systemic barriers to employment for persons with disabilities. OVR is taking proactive steps with ODP to develop and use communication tools for interagency collaboration. Our intention is to provide seamless services to those individuals who can benefit from multiple service providers/funders and, at the same time, to allow for successful and stable community integrated and competitive employment. OVR is participating on a Cross Agency Workgroup with ODP, OMHSAS, and OTL to address systemic barriers to employment for persons with disabilities, particularly those identified with regard to service definitions, funding, and legislation for supported employment. OVR is actively looking for

ways to provide more opportunities to support individuals in competitive, community–integrated employment who have multiple sources of funding and who may not have considered competitive, community–integrated employment previously.

The inclusion of customized employment services as a tool used alongside SE services can allow more intensive services to be offered for individuals with disabilities who are seeking competitive, community–integrated employment and historically may not have been able to benefit from VR services. Additionally, the OVR SE policy is under review both to address these issues and to align with new WIOA provisions. Any recommendations for revision will address the use of the most appropriate and cost effective services for VR customers and how best to plan for sustaining employment as VR services fade and eventually come to an end. OVR is working with various Centers for Independent Living (CILs) across the state to develop SE services that are provided by vendors who can offer a full range of independent living supports beyond employment. The intention of collaborating with CILs is to ensure that individuals who are using VR services are getting a full range of services fostering rehabilitation and independence at the same time to the benefit of the VR customer.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

Goal I: Increase Employment Opportunities for People with Disabilities 1) Increase the number of Business Enterprise Program (BEP) locations as well as people who go through training in the BEP.

BEP analyzed the Hadley online training and made plans to test the system to see what could be eliminated from the HGAC program. The online Hadley training program was tested by a representative of the Elected Committee, as well as BEP staff, to determine the best utilization for online training for customers. BEP also continued to review the training program at HGAC to ensure training materials and equipment were current and relevant to customers in the program. BEP continued to do outreach and interview candidates for the program. BEP also continued to investigate online training opportunities to increase customer participation in the BEP program. Additionally, BEP collaborated with the Elected Committee of Blind Operators to consider and promote opportunities for individuals who are blind.

2) Partner with the Bureau of Workforce Partnership and Operations (BWPO) to train or retrain PA CareerLink® on disability awareness and OVR fundamentals.

OVR developed an "Introduction to OVR" training, which was made available on the Employee Self Service training site in 2013. This training provides a general summary of OVR, the VR process and how to initiate services. OVR also developed "Disability Awareness, Etiquette and Sensitivity: A

Training Program for PA CareerLink® Personnel" which was updated and made available in 2014. This training summarized the effective "Ten Commandments of Communicating with People with Disabilities" training video. OVR staff have also provided numerous in–person training events for PA CareerLink® personnel at local sites which covered topics such as the VR process, AT, disability awareness and sensitivity topics, the 2008 ADA Amendments Act, and the new rules for Section 503 of the 1973 Rehabilitation Act and the 1974 Vietnam Era Veteran Readjustment Assistance Act (VEVRAA) guiding businesses with federal contracts on the hiring for individuals with disabilities and protected veterans. OVR staff members actively participate on the PaRC PA CareerLink® subcommittee which is focused on making PA CareerLink® centers programmatically and physically accessible to individuals with disabilities. Currently, a Regional Manager, a District Administrator and a VR Specialist participate on this subcommittee.

3) Evaluate the cost–effectiveness and structure of current Supported Employment (SE) programs.

OVR established a goal of providing services to 875 customers via Title VI, Part B Funds distributed to Pennsylvania in FFY 2014. This goal was based on the Title VI, Part B allotment for FFY 2013 divided by the average cost per rehabilitation case for the previous year. 663 customers received Supported Employment services via the available $818,794 Title VI, Part B funds. The reason in the discrepancy of the goal and the actual numbers was that cost for services increased while the amount of Title VI, Part B funds were less than anticipated. However, the number of VR customers served through SE services did not decrease. In fact, the number increased. Unfortunately, the amount of funds available was not sufficient to reach the intended goal. During FFY 2014, SE services were provided to 6,967 individuals with disabilities. Of that number, 1,492 were placed of which 1,458 were placed in competitive employment and 1,145 were working 20 hours or more a week. Reviewing OVR SE data allowed field staff to analyze trends and patterns to determine where in the VR process customers experienced challenges to success in community, competitive, and integrated employment. Review of data also allowed for a better understanding of which customers are receiving supported employment services. This knowledge assisted OVR staff in being able to clarify issues, address them and in turn increase the success of customers receiving supported employment services. Overall, SE services are the most effective cost service used by OVR. In 2013/14 the successful closure rate of customers via SE services was over 60 percent.

Goal II. Increase/Improve Transition Services for Students with Disabilities

1) Continue collaborative activities that include projects with the PA Community on Transition Employment Practice Group and development of joint training modules for OVR and Department of Education staff, families, advocates, educators and youth.

OVR continued to work through the Community of Practice State Leadership Team (SLT) on Transition to provide trainings on OVR services and procedures to all of our partner agencies. This was done through SLT sponsored webinars, the Statewide Transition Conference and monthly SLT meetings when OVR provided updates to the members on activities, programs and new initiatives within OVR. Local District Office staff participated in School to Work Transition Council meetings and provided guidance to families, advocates, educators and youth. OVR staff also regularly provided informational trainings to county and regional service providers to keep them updated and aware of OVR’s mission. The Early Reach Coordinators continued to reach out to schools and provide information to educational staff, families, and students about OVR services. Through our participation in the annual Statewide Transition Conference, OVR developed sessions which were presented to all attendees on OVR programs and policies.

2) Continue the Cognitive Skills Enhancement Program (CSEP) to assist District Offices in the transition needs of students with disabilities and to reflect the stated needs of VR Counselors; and continue to offer CSEP as a service to OVR customers who wish to pursue postsecondary training at HGAC or elsewhere.

Hiram G Andrews Center continued to work collaboratively with the University of Pittsburgh in offering the Cognitive Skills Enhancement Program (CSEP). The program continued to have a full complement of students throughout 2014, serving customers from OVR District Offices across the state. There were 45 students enrolled in CSEP during 2014. The majority completed CSEP and moved into employment or a vocational training program at HGAC or another postsecondary institution.

3) Continue implementation of Articulation Agreements between the Commonwealth Technical Institute at HGAC and secondary schools to improve accessibility of post–secondary programs at HGAC to eligible high school students.

The Commonwealth Technical Institute continued to pursue articulation agreements as a Perkins–Funded Postsecondary Institution with Secondary Schools with Department of Education–Approved Career and Technical Education Programs of Study. In 2014, articulation agreements were completed for Building Maintenance, Small Engine Mechanic Technology, AST Computer Technology/Computer Systems Technology, AST Culinary Arts, Automobile/Automotive Mechanics and Carpentry programs with effective dates through 2017.

4) Begin working with students starting at age 14 (and their parents) so they know what services we offer and how they can maximize their high school experience, whether through general education or special education, to increase their opportunity for success when they transition to adult life through higher education or employment.

In order to assist youth with disabilities better prepare for their transition into the world of work and independence, OVR started a new initiative called Early Reach. Early Reach is an outreach initiative intended to promote successful outcomes for youth with disabilities by increasing awareness of OVR services and the benefits of early career planning. The initiative adds a new position called an Early Reach Coordinator (ERC) to the rehabilitation team in OVR's fifteen district offices.

The ERCs reach out to youth with disabilities, their parents, local schools and community agencies that serve youth. The purpose of this outreach is to connect with youth with disabilities early, beginning at age 14, so that they know more about OVR services and can better prepare for vocational choices and living independently. In addition, ERCs are knowledgeable about other services that are available to youth with disabilities who are transitioning from school to adult life. An ERC is available in each of the 15 OVR BVRS District Offices.

5) Maintain and strengthen specific working relationships between Department of Human Services (DHS), Department of Education (PDE) and OVR on transition–related issues, including reviewing and updating transition policies.

OVR continued to collaborate with its partners in DHS and PDE on a number of interagency initiatives. OVR continued to be represented on the Pennsylvania Developmental Disabilities Council and the Pennsylvania Special Education Advisory Panel. OVR continued to co–lead the PA Community of Practice on Transition with the Bureau of Special Education on which representatives from all MOU partners serve. OVR also worked with partners in the Office of Developmental

Programs (ODP) Employment First State Leadership Mentoring Project in order to promote employment for youth with disabilities across all public agencies.

6) Develop a social media plan, as well as traditional outreach materials, tailored to students and families.

OVR has already connected with 340 followers on LinkedIn and 580 on Facebook as part of our agency's social media initiative, which was launched in October 2013. OVR has been delivering content on a more frequent basis since the platforms became available. Information is gathered from local district offices, statewide events, and national sources. Social media posts have highlighted OVR–sponsored activities and events, agency accomplishments, customer success stories and other information pertinent to our consumer and business customers. OVR will increase and refine our social media presence moving forward, with a continued emphasis on delivering quality content and relevant information to all of our customers in a timely manner. OVR will continue to evolve with the changing social media landscape and adapt our strategies, as necessary, in order to ensure that the material we provide is accessible and impactful. OVR has also added an Administrative Office position to the Business Services and Outreach Division, which will focus direct marketing, branding, and public outreach using print, web applications, and social media. This new position will allow a dedicated staff member with experience and expertise in the field to focus on the proper evolution and growth of OVR's social media strategy.

7) Develop a transition resource manual (tool kit) for OVR staff.

The OVR Transition Resource Manual has been developed and posted electronically on the agency's shared drive. It will be monitored and updated as necessary as resources and tools are further developed. Training was provided in the spring of 2015.

8) Expand the capacity of programs targeted toward transitioning students to postsecondary or employment opportunities.

The Business Services and Outreach Division (BSOD) launched the Jobs for All – OJT for time–limited, paid work experiences to help OVR consumers under age 25 to increase their access to work while in school and active plan status, prior to achieving their OVR IPE placement goal. Training on the use of the Jobs for All – OJT was provided to all staff via a video conference presentation in June 2014. Sites developed and used by counselors since launch in October have included: Allegheny National Forest, Allied Barton Security Services LLC, Juniper Village at Meadville, Great Lakes Cast Stone, Prime Lawn Care Service, Faith in Action, Grandma's House Childcare, Sterling Technologies, Inc., Luxe Salon and Spa, K&D Auto Electric, Inc., Windber Medical Center, Under the Horizon, Golden Living Center–Oil City, Starbucks Coffee Co. and Landis Homes.

Goal III: Improve Community Education and Outreach

1) Develop a public awareness and outreach strategy.

Members of the Executive Team met in December 2014 to consider a draft Invitation for Bid (IFB) to retain a marketing and advertising agency to review current outreach materials and web site and social media content with a goal to create a strategic plan for increased name recognition, increased business/employer recognition and improved consistency of the OVR message on services to consumer and business customers.

2) Combine OVR's and Pennsylvania State Rehabilitation Council's (PaRC) Customer Satisfaction Surveys.

This was completed in September of 2014 and was implemented in CWDS. The surveys are sent to customers exiting the VR program as successful closures electronically via e–mail. Their responses are compiled within CWDS for analysis.

3) Strengthen relationship with Citizen Advisory Committees (CAC) and ensure that CAC activities are posted on the PaRC web site.

All district offices send meeting information (date, time, location, agenda and approved minutes) which are then posted on the PaRC website on a monthly basis.

4) Continue an emphasis on OVR's employer outreach to promote the employment of individuals with disabilities.

Presentations on the new Business Services and Outreach Division have been made at the 2014 Pennsylvania Workforce Development Annual Conference, Council of State Administrators of Vocational Rehabilitation National Employment Teams (CSAVR NET), Central Penn Business Journal (CPBJ) Summer Business Profiles Edition, Pittsburgh Regional Governors Jobs 1st Employment Summit, L&I North–Central and Southwestern On–the–Road Economic Development outreach events with L&I Secretary and workforce teams, Rehabilitation Community of PA (RCPA) 2014 Annual Conference, 2014 PA Disability Employment and Empowerment Conference (PADES), University of Scranton North Eastern U.S. Disability Employment Conference, local Society of Human Resources (SHRM) and Chamber of Commerce meetings, NDEAM regional Business and Employer Outreach Events, combined PA OVR BSOD and local PA CareerLink®/WDB employer presentations on ADAAA and Section 503 regulations on individual with a disability federal contractor hiring goals, and through use of OVR Social media pages.

5) Increase outreach to OVR stakeholder groups and the public to increase dialog, public awareness of OVR services, and expand opportunities for individuals with disabilities.

OVR expanded its participation in National Disability Employment Awareness Month (NDEAM). In 2014, OVR created, sponsored, or took part in 65 NDEAM–associated events, including job fairs, trainings and special presentations – an increase of 15 events (thirty percent) from the previous year's activities. A detailed social media plan was operationalized, including an OVR Facebook page and LinkedIn platform, which expanded knowledge–sharing among VR professionals and outreach to current and potential customers. These platforms were especially helpful in publicizing NDEAM events. Each District Office was required to submit an annual stakeholder outreach plan in advance, as well as quarterly updates on the plan status. District Offices were also instructed to attend and participate in their local WIB meetings and provide updates.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

Staff capacity and available resources may impact achievement of goals and priorities.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT

FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

OVR established a goal of providing services to 875 customers via Title VI, Part B Funds distributed to Pennsylvania in FFY 2014. This goal was based on the Title VI, Part B allotment for FFY 2013 divided by the average cost per rehabilitation case for the previous year. 663 customers received Supported Employment services via the available $818,794 Title VI, Part B Funds. The reason in the discrepancy of the goal and the actual numbers was that cost for services increased while the amount of Title VI, Part B funds were less than anticipated. This did not decrease the number of VR customers served through SE services, in fact the number increased, it is just the amount of Title VI, Part B funds available was not sufficient to reach the intended goal.

During FFY 2014, Supported Employment services were provided to 6,967 individuals with disabilities. Of that number, 1,492 were placed, with 1,458 in competitive employment, with 1,145 working 20 hours or more a week. Reviewing SE data allowed field staff to analyze trends and patterns in the rehabilitation process in which customers experienced challenges to success in community, competitive, and integrated employment.

Review of data also allowed for a better understanding of which customers are receiving SE services. This knowledge assisted OVR staff to clarify issues, address them and, in turn, increase the success of customers receiving SE services. Overall, SE services are the most effective cost service used by OVR. In 2013/4 the successful closure rate of customers receiving SE services was over 60%.

OVR will use Title VI, Part B Funds to provide Supported Employment services to customers throughout the Commonwealth. Services are provided by way of contracts with Community Based Rehabilitation Providers using an individualized, performance-based job coaching model. Once the Title VI, Part B Funds have been exhausted, Title I Funds are used to provide Supported Employment services.

Supported Employment (SE) services are a vital part of OVR programming. SE services secure employment for individuals with the most significant disabilities who would not experience an employment outcome from less intensive job placement methods. It is anticipated that approximately 6,800 Pennsylvanians with the most significant disabilities will receive SE services in FFY 2014. Of this number, approximately 875 individuals will be funded out of the $926,000 Title VI, Part B Funds anticipated for distribution to Pennsylvania in FFY 2015.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

OVR is preparing to make revision to its supported employment policy during FFY 2014. Change that may be considered will look to provide ongoing evaluation to ensure services are being provided to those customers most in need. Increasing communication among VR partners is an area that is to be addressed. A considered focus is achieving a higher level of stability as part of successful employment outcomes through supported employment funding. An important goal for OVR is to continue to expand SE services for under-served populations. This goal includes providing quality

services to rural areas, to continue to increase successful outcomes for transition-aged youth, and to ensure accessibility of services for all potential customers. Another goal is to enhance OVR partnerships with provider agencies such as the Office of Developmental Programs (ODP), the Office of Mental Health and Substance Abuse Services (OMHSAS), and Office of Long Term Living (OLTL). These agencies provide the necessary long-term supports needed to ensure the employment success of the individual with a disability.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA.

These are new indicators, so we have not been able to capture that data for 2014. However, we are putting reports in place so that we will have this information ready for the next VR portion of the State Plan.

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED.

OVR continues to support innovation and expansion approaches through ongoing Letters of Understanding (LOU) that are developed between community rehabilitation providers and OVR to support the expansion of services to individuals with disabilities, particularly individuals with the most significant disabilities. This allows us to constantly evaluate and develop new service activities that bring about innovative approaches to serving customers with disabilities more effectively.

OVR continually considers the development of new and emerging services with existing community rehabilitation providers to meet the needs of our customers. As funds are available, OVR will develop a Request for Quote (RFQ) for Innovation and Expansion Projects to provide new strategies and programs to improve employment outcomes for individuals with the most significant disabilities. These projects will target expansion of employment services into rural and underserved counties, job readiness and job placement of customers with the most significant disabilities who have traditionally been underserved, transition services for students with disabilities, pre–employment transition services for students with disabilities, replication of Project SEARCH for students or youth with disabilities, and/or the development of Industry Integrated Employment programs, as well as other innovative strategies identified by local OVR staff. OVR anticipates that potential contracts would generally be up to $150,000 for the initial project year. Higher contract awards could be accepted for proposals of exceptional activity, as funds are available.

Innovation and Expansion funds will be used to support the funding of the State Rehabilitation Council.

Innovation and Expansion funds have not been used to support the Statewide Independent Living Council’s resource plan as other sources of funding have been available. Centers for Independent Living have received funds for innovation and expansion projects in the past.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

OVR provides SE services to Pennsylvanians with disabilities through a network of community–based Community Rehabilitation Providers (CRPs). Services provided through these vendors/partners are described below:

Background Beginning in the early 1980s, OVR developed a system of SE services using a fee–for–service payment system. Initially, 17 CRPs of SE services were funded through a 5–year, OSERS, Title III supported employment State Change Grant. The number of SE CRPs approved to provide services to OVR has since grown to over 100. There are over 50 SE CRPs contracted specifically with OVR's Bureau of Blindness and Visual Services (BBVS) program. SE services are now provided statewide and include time–limited and, to a much lesser degree, time–enduring services.

OVR SE services include transitional employment through the Clubhouse model for persons with significant mental health disabilities. Also, SE services have been provided on a broader basis since the late 1990's to persons who are deaf via contracting with SE CRPs fluent in American Sign Language. The use of SE for customized employment (CE) cases is being piloted in 2015 to expand the breadth of SE services OVR offers. The use of CE in addition to SE will allow OVR to assist individuals who require very intensive services but are interested in and working towards competitive community integrated employment. OVR District Offices continue to work with other key state and private agencies, such as OHMSA), ODP, OLTL and PDE. In addition, OVR partners with private community service CRPs to expand and develop all types of community–integrated competitive employment as defined by the individual needs of customers.

OVR currently uses what is commonly known as the milestone SE method. OVR has termed its version "Performance Based Job Coaching" (PBJC) and has used this method of funding community–based SE vendors since 1999. This format was based upon research completed by OVR in the mid–1990's to determine best practices for SE service provision. The above–mentioned format was reviewed in 2013 and 2014 for areas of improvement. Additionally, OVR has reviewed SE data for a three–year funding cycle to determine what policy revisions should be considered to improve the provision of SE services.

Quality Standards OVR provides technical assistance and training for its staff through the use of seminars, conferences, and training programs. SE services provided by community based service CRPs are reviewed at least every 5 years to look at relevance and costs related to such services.

Staff from Virginia Commonwealth University (VCU), OVR and the Pennsylvania Association of Rehabilitation Facilities (PARF) developed statewide standards for OVR and CRPs of SE services. These standards continue to guide all contracts and contract reviews for provision of SE services. The standards (as updated) are as follows:

1. The population to be served

a. Individuals served are those eligible for the state/federal VR program.

b. Targeted consumers are individuals with disabilities needing services to obtain, retain, or prepare for community based competitive employment that is consistent with their capacities and abilities.

c. The SE program is responsive to customer needs and to the employment opportunities available in the community.

2. Outcomes for SE Program Participants

a. The program encourages, promotes, and provides for integration in the competitive work force.

b. Skill acquisition challenges the individual's potential to be productive as defined by the employer and employment market.

c. The number of hours worked by the participants should be the maximum hours possible based upon the unique strengths, resources, interests, concerns, abilities and capabilities of individuals with the most severe disabilities. The maximum number of employee benefits possible must be sought as well. A competitive employment situation is the intended result, and ideally, it is a position that is full–time with benefits and provides the best opportunity for independence.

3. The SE Community Rehabilitation Provider (CRP) Organization

a. The CRP mission statement is consistent with the planned services.

b. There is evidence that the CRP has the ability to deliver vocational rehabilitation services in the form of community based work assessments, job readiness training, job development, job placement, job analysis, job skills training, on–the–job supports, itinerant supports and extended services among others.

c. The CRP demonstrates prior experience or otherwise presents the capability to deliver services, such as linkages with other services, adequate staff, training for staff and other supports for staff, etc.

d. The CRP has a method in place to measure and report the outcomes of services, e.g., automated or alternative method of service reporting and tracking.

e. There are job descriptions for all service CRP staff.

f. Staff development is an integral part of the CRP's budget or annual plan.

g. The CRP demonstrates that individuals with disabilities have a substantial role in the establishment of organizational policy and delivery of services.

4. The Service Design

a. The CRP presents for consideration: i. Definitions of Services ii. Staffing pattern that includes individuals with disabilities iii. Model to be used including plan for community integration, job development, placement, training and extended services iv. Linkage with OVR and other funding sources (DHS, PDE) v. Consistent opportunities for informed customer choice

5. Local Linkages:

a. The CRP demonstrates a knowledge and ability to develop and maintain linkages with other ancillary services in the community, e.g., the L&I BWPO, the PDE Bureau of Special Education (BSE), the DHS (OMHSAS, ODP), the PA Department of Aging (Office of Long Term Living (OLTL), Drug and Alcohol Single County Authorities (SCA), Chambers of Commerce and other extended service agencies and organizations.

b. OVR reviews, discusses, and works closely with the CRP for mutually responsive programs. The OVR counselor is integral to customer progress, service delivery, and placement activities occurring in concert with the CRP. A process is in place to measure and report the outcome of services.

Scope and Extent SE services provided to individuals include: evaluations, skills training, job modification and/or customization, transportation and transportation training services, coordination of ancillary services, advocacy and socialization skills, among others. All services are provided on an individual basis and are tailored to the individual's needs to achieve a specific vocational goal.

Pennsylvania has established local mechanisms through which funding for intensive training and extended services is available for all eligible populations. Populations receiving SE includes individuals with developmental disabilities, mental health issues, physical disabilities, blindness, deafness, autism and traumatic brain injury, among many other needs. SE services are also available within the special education, mental health and developmental disability systems. OVR is actively engaged in collaborative relationships with those systems to ensure the provision of effective services, to reduce duplication of efforts, to share resources, and to improve employment outcomes for those served mutually by multiple systems.

In Pennsylvania, three major sources of extended service funding are available to ensure availability to customers who require long term support such as those who receive services from ODP and OLTL. OVR also has a limited amount of funds for customers who do not have other sources of long–term funding. These funds are the VR state SE funding. They are intended for customers who need extended services and who have no other source for extended services after the intensive supports are faded from the employment situation.

Actual funding available from ODP and OLTL varies from county to county depending upon each county's situation. Other resources sought for extended service funding are natural supports, SSA work incentives, private foundations, etc.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Timing of the Transition to Extended Services The timing of the transition of an individual with a disability to extended services is dependent upon the needs of the customer and the employer, and in most cases, available funding from one of the DHS agencies (OMHSAS, ODP and OLTL). Extended services may not be needed for the individual who has appropriate natural supports such as the employer, co–workers, family, and friends. However, extended services must be offered for situations where natural supports for the needs of the employee are missing or incomplete.

The determination of the need for extended services begins at the assessment stage of the VR plan. At that time the rehabilitation team, OVR staff, the individual, the individual's family, and, if applicable, the individual's Case Manager/Supports Coordinator determine what resources are needed for long–term supports. This team collaboratively determines what resources are available to meet the extended services need.

Due to the intensive and short–term nature of OVR supports, other partners (including funders) must be involved to ensure long–term success for the worker with a disability. The rehabilitation team must plan carefully for the needs of an individual with a disability to determine the best time for the employee with a disability to transition to extended services. The sooner the team can be assembled and focused on supporting the customer, the better the transition to extended services will be to meet the needs of the customer and employer.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Pennsylvania Office of Vocational Rehabilitation**

Name of designated State agency **State Board of Vocational Rehabilitation**

Full Name of Authorized Representative: **David J. DeNotaris**

Title of Authorized Representative: **Executive Director**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

FOOTNOTES

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Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant’s Organization **Pennsylvania Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **David J. DeNotaris**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

The undersigned states, to the best of his or her knowledge and belief, that:
If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant's Organization **Pennsylvania Office of Vocational Rehabilitation**

Full Name of Authorized Representative: **David J. DeNotaris**

Title of Authorized Representative: **Executive Director**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable) (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:**The State Plan must provide assurances that:**

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A)(21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(16)(B) OF THE REHABILITATION ACT.

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **Yes**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT .

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES, STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A)(15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE APPROACHES TO

EXPAND AND IMPROVE THE PROVISION OF VR SERVICES TO INDIVIDUALS WITH DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.

M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

The designated State agency, or designated State unit, as appropriate, assures that it will:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above **No**

D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.

F. COMPLY WITH REQUIREMENTS REGARDING THE PROVISIONS OF INFORMED CHOICE FOR ALL APPLICANTS AND ELIGIBLE INDIVIDUALS IN ACCORDANCE WITH SECTION 102(D) OF THE REHABILITATION ACT.

G. PROVIDE VOCATIONAL REHABILITATION SERVICES TO AMERICAN INDIANS WHO ARE INDIVIDUALS WITH DISABILITIES RESIDING IN THE STATE, IN ACCORDANCE WITH SECTION 101(A)(13) OF THE REHABILITATION ACT.

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN

AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14)OF THE REHABILITATION ACT.

I. MEET THE REQUIREMENTS IN SECTIONS 101(A)(17) AND 103(B)(2) OF THE REHABILITATION ACT IF THE STATE ELECTS TO CONSTRUCT, UNDER SPECIAL CIRCUMSTANCES, FACILITIES FOR COMMUNITY REHABILITATION PROGRAMS

J. WITH RESPECT TO STUDENTS WITH DISABILITIES, THE STATE,

I. HAS DEVELOPED AND WILL IMPLEMENT,

A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

II. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

A. THE DESIGNATED STATE UNIT ASSURES THAT IT WILL INCLUDE IN THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN ALL INFORMATION REQUIRED BY SECTION 606 OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT REPORTS IN SUCH FORM AND IN ACCORDANCE WITH SUCH PROCEDURES AS THE COMMISSIONER MAY REQUIRE AND COLLECTS THE INFORMATION REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT SEPARATELY FOR INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE I AND INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE VI OF THE REHABILITATION ACT.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL EXPEND NO MORE THAN 2.5 PERCENT OF THE STATE'S ALLOTMENT UNDER TITLE VI FOR ADMINISTRATIVE COSTS OF CARRYING OUT THIS PROGRAM; AND, THE DESIGNATED STATE AGENCY OR AGENCIES WILL PROVIDE, DIRECTLY OR INDIRECTLY THROUGH PUBLIC OR PRIVATE ENTITIES, NON-FEDERAL CONTRIBUTIONS IN AN AMOUNT THAT IS NOT LESS THAN 10 PERCENT OF THE COSTS OF CARRYING OUT SUPPORTED EMPLOYMENT SERVICES PROVIDED TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES WITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL USE FUNDS MADE AVAILABLE UNDER TITLE VI OF THE REHABILITATION ACT ONLY TO PROVIDE SUPPORTED EMPLOYMENT SERVICES TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, WHO ARE ELIGIBLE TO RECEIVE SUCH SERVICES; AND, THAT SUCH FUNDS ARE USED ONLY TO SUPPLEMENT AND NOT SUPPLANT THE FUNDS PROVIDED UNDER TITLE I OF THE REHABILITATION ACT, WHEN PROVIDING SUPPORTED EMPLOYMENT SERVICES SPECIFIED IN THE INDIVIDUALIZED PLAN FOR EMPLOYMENT, IN ACCORDANCE WITH SECTION 606(B)(7)(A) AND (D), OF THE REHABILITATION ACT.

7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT:

I. THE COMPREHENSIVE ASSESSMENT OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES CONDUCTED UNDER SECTION 102(B)(1) OF THE REHABILITATION ACT AND FUNDED UNDER TITLE I OF THE REHABILITATION ACT INCLUDES CONSIDERATION OF SUPPORTED EMPLOYMENT AS AN APPROPRIATE EMPLOYMENT OUTCOME, IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 606(B)(7)(B) OF THE REHABILITATION ACT

II. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

4(c) Pennsylvania OVR is under an OOS and gives priority first to individuals with the Most Significant Disabilities (MSD). OVR has elected not to serve eligible individuals outside the current order of selection who require VR services or equipment to maintain employment unless OVR amends its State plan prior to the 2-year modification.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

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* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

CAREER AND TECHNICAL EDUCATION PROGRAMS AUTHORIZED UNDER THE CARL D. PERKINS CAREER AND TECHNICAL EDUCATION ACT OF 2006

NOTE

NOTE: Unless otherwise noted, statutory references in this section are to P.L.109-270—Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Perkins IV or the Act). (20 U.S.C. 2301 et seq.) Please provide your Perkins IV State Plan, including any revisions for the upcoming program year, in the text boxes below. Please note the following as you make this submission:

- Use bold text to denote revisions to your plan.
- You are not required to provide or revise portions of your State's Perkins State Plan that are no longer relevant, for example, items pertaining to a transition year under Perkins IV. Accordingly, text boxes are not provided for those items below.
- You are not required to hold separate hearings for the Perkins portion of your WIOA Combined State Plan, unless your State determines that there is a "significant and relevant" change in: (1) the information or assurances in the Perkins plan; (2) the administration or operation of the Perkins plan; or (3) the organization, policies, or operations of the State agency that received the grant, if the change materially affects the information or assurances in the Perkins plan. See Question A.12 in the Department's Perkins IV Non-Regulatory Guidance Q&A -Version 4.0, released April 24, 2015. Accordingly, if your State determines that no significant or relevant change is being made, you are not required to provide or revise Section I, Planning, Coordination, and Collaboration Prior to State Plan Submission, unless your State chooses to do so.
- Congress eliminated a separate allocation for Title II, Tech Prep Programs under Perkins IV in the 2011 Continuing Resolution. Accordingly, States are not required to provide or revise Section V, Tech Prep Programs, or other items of their Perkins State Plan pertaining to tech prep programs unless your State chooses to do so.
- You are not required to provide or revise your EDGAR certifications and assurances unless your State determines that a significant or relevant change needs to be made.

Once you have entered your plan, please click on the link below to the Perkins State Plan Portal. There you must enter your request to extend your Perkins State Plan, an updated budget, performance levels for the upcoming program year, and, if applicable, updated EDGAR certifications and assurances.

I. PLANNING, COORDINATION, AND COLLABORATION PRIOR TO STATE PLAN SUBMISSION

As noted above, in addition to entering your Perkins State Plan and any revisions for the upcoming year, you must submit a request to extend your Perkins State Plan using the link to the Perkins State Plan Portal below. You are not required to hold separate hearings for the Perkins portion of your WIOA Combined State Plan unless your State determines that there is a "significant and relevant" change in: (1) the information or assurances in the Perkins plan; (2) the administration or operation of the Perkins plan; or (3) the organization, policies, or operations of the State agency that received the grant, if the change materially affects the information or assurances in the Perkins plan. See Question A.12 in the Department's Perkins IV Non-Regulatory Guidance Q&A -Version 4.0, released April 24, 2015. Accordingly, if your State determines that no significant or relevant change is being made, you are not required to provide or revise this Section I, Planning, Coordination, and Collaboration Prior to State Plan Submission, unless your State chooses to do so.

A. STATUTORY REQUIREMENTS

1. THE STATE MUST CONDUCT PUBLIC HEARINGS IN THE STATE, AFTER APPROPRIATE AND SUFFICIENT NOTICE, FOR THE PURPOSE OF AFFORDING ALL SEGMENTS OF THE PUBLIC AND INTERESTED ORGANIZATIONS AND GROUPS (INCLUDING CHARTER SCHOOL AUTHORIZERS AND ORGANIZERS CONSISTENT WITH STATE LAW, EMPLOYERS, LABOR ORGANIZATIONS, PARENTS, STUDENTS, AND COMMUNITY ORGANIZATIONS), AN OPPORTUNITY TO PRESENT THEIR VIEWS AND MAKE RECOMMENDATIONS REGARDING THE STATE PLAN. (SECTION 122(A)(3))

The Pennsylvania Department of Education scheduled three hearings within the state. The notice of Perkins IV public hearings were sent to all stakeholders through various media. Stakeholders received a notice of the hearings by e–mail. The state has a distribution list that reaches every local education agency and is the predominate means for making announcements statewide (PennLink). An announcement was prepared and distributed through the Pennlink system to all school districts and career and technical centers. Additionally, the hearing notice was sent to all Perkins recipients. In order to notify individuals not associated with school entities, the announcement was published in the PA Bulletin. In addition, draft documents of the five year plan and guidelines were posted on the Pennsylvania Department of Education's Bureau of Career and Technical Education's Perkins webpage for review prior to public hearings scheduled for December 2007.

The announcement follows:

Perkins IV Five Year State Plan Hearing Announcement

Pursuant to Section 122 (a) (3) of the "Carl D. Perkins Career and Technical Education Improvement Act of 2006", public hearings will be conducted in the following locations to allow for stakeholder groups as defined in Section 122 (b) (1) of the Act to present their views and make recommendations regarding the Perkins IV Five Year State Plan.

To view documents, please visit our website at www.education.pa.gov

Tuesday, December 4, 2007 Community College of Allegheny County, Boyce Campus 595 Beatty Road Monroeville, PA 15146–1348 Auditorium 1:00 pm – 4:00 pm Wednesday, December 5, 2007 Central PA Institute of Science and Technology 540 North Harrison Road Pleasant Gap, PA 16823–8644 Lab 2 1:00 pm – 4:00 pm

Thursday, December 6, 2007 Lehigh Career and Technical Institute 4500 Education Park Drive Schnecksville, PA 18078–2501 JOC Boardroom 1:00 pm – 4:00 pm

If you wish to provide public comment, please contact Ellie Bicanich at eeb6@psu.edu no later than December 1, 2007 to schedule a 15–minute time slot during one of the three regionally based public hearing sites listed above. Testimony will be restricted to issues that address CTE policy and/or programs, and not to air personal complaints. Participants are asked to summarize testimony at the hearings and submit written copies of testimony to the panel.

2. THE STATE MUST INCLUDE A SUMMARY OF THE ABOVE RECOMMENDATIONS AND THE ELIGIBLE AGENCY'S RESPONSE TO SUCH RECOMMENDATIONS IN THE STATE PLAN. (SECTION 122(A)(3))

In compliance with Section 122 (a) (3) of the "Carl D. Perkins Career and Technical Education Improvement Act of 2006", public hearings were scheduled in December 2007 at three regional locations to allow for stakeholder groups as defined in Section 122 (b) (1) of the Act to present their views and make recommendations regarding the Perkins IV Five Year State Plan. Three public hearings were scheduled for December 4–5, 2007 and were held regionally across Pennsylvania. The Central Region hearing was cancelled due to lack of participation. In addition to the hearings, the state plan was made available to the public through the Pennsylvania Department of Education website and was distributed to directors of career and technical education and others requesting copies through e–mail correspondence.

Hearing panel members were moderated by administration of Workforce Investment Boards and members included individuals from business and industry. Six individuals provided public comment. The Perkins IV State Plan reflects responses to the comments.

Comments included: • Ensuring sending schools and career and technical centers strengthen their relationships to implement comprehensive high school reform. • Ensuring secondary students are prepared academically for postsecondary education • Developing a statewide articulation agreement that will have a positive impact on student participation in postsecondary career and technical education programs. • Developing or identifying reliable methods of technical skill attainment and occupational competency testing for postsecondary programs. • Ensuring programs of study are connected to the Science, Technology, Engineering and Mathematics (STEM) initiative.

One comment addressed Pennsylvania Department of Education regulation Chapter 339, which has no impact on the Perkins IV State Plan.

3. THE STATE MUST DEVELOP THE STATE PLAN IN CONSULTATION WITH ACADEMIC AND CAREER AND TECHNICAL EDUCATION TEACHERS, FACULTY, AND ADMINISTRATORS; CAREER GUIDANCE AND ACADEMIC COUNSELORS; ELIGIBLE RECIPIENTS; CHARTER SCHOOL AUTHORIZERS AND ORGANIZERS CONSISTENT WITH STATE LAW; PARENTS AND STUDENTS; INSTITUTIONS OF HIGHER EDUCATION; THE STATE TECH PREP COORDINATOR AND REPRESENTATIVES OF TECH PREP CONSORTIA (IF APPLICABLE); ENTITIES PARTICIPATING IN ACTIVITIES UNDERTAKEN BY THE STATE BOARDS UNDER SECTION 101 OF THE WIOA; INTERESTED COMMUNITY MEMBERS (INCLUDING PARENTS AND COMMUNITY ORGANIZATIONS); REPRESENTATIVES OF SPECIAL POPULATIONS; REPRESENTATIVES OF BUSINESS AND INDUSTRY (INCLUDING REPRESENTATIVES OF SMALL BUSINESS); AND REPRESENTATIVES OF LABOR ORGANIZATIONS IN THE STATE. THE STATE ALSO MUST CONSULT THE GOVERNOR OF THE STATE WITH RESPECT TO DEVELOPMENT OF THE STATE PLAN. (SECTION 122)

The five year Perkins IV State Plan was developed in consultation with vested stakeholders. A list of State Plan Committee members is found on pages 87–88. The State Plan Committee met monthly from September through October. The time period between meetings involved continued consultation with committee members and other interested stakeholders.

4. THE STATE MUST DEVELOP EFFECTIVE ACTIVITIES AND PROCEDURES, INCLUDING ACCESS TO INFORMATION NEEDED TO USE SUCH PROCEDURES, TO ALLOW THE INDIVIDUALS AND ENTITIES LISTED IN ITEM 3 ABOVE TO PARTICIPATE IN STATE AND LOCAL DECISIONS THAT RELATE TO DEVELOPMENT OF THE STATE PLAN. (SECTION 122(B)(2))

All state planning documents were distributed as e–mail attachments and hard copy to state planning team committee members. All team members received copies of the transition state plan and state planning guide prior to the initial meeting conducted in July to facilitate communication between the members and Pennsylvania Department of Education (PDE). During the meetings state plan committee members provided their input into the policies and procedures included in the state plan. They also drafted and approved final language.

Draft copies of the plan were made available throughout the planning process to stakeholders not on the planning committee. Their input was presented to the state plan committee members and discussion was held. In addition, committee members discussed the plan with other interested stakeholders in between meetings. E–mail exchanges took place among state plan committee members. Throughout this process consensus was reached in all areas of the plan. The State Board of Vocational Education was also actively involved in providing input. During each Standing Committee meeting and SBVE meeting, updates were provided to the Board members and their input and questions were addressed and changes made to the plan.

5. THE STATE MUST DEVELOP THE PORTION OF THE STATE PLAN RELATING TO THE AMOUNT AND USES OF ANY FUNDS PROPOSED TO BE RESERVED FOR ADULT CAREER AND TECHNICAL EDUCATION, POSTSECONDARY CAREER AND TECHNICAL EDUCATION, TECH PREP EDUCATION, AND SECONDARY CAREER AND TECHNICAL EDUCATION AFTER CONSULTATION WITH THE STATE AGENCY RESPONSIBLE FOR SUPERVISION OF COMMUNITY COLLEGES, TECHNICAL INSTITUTES, OR OTHER 2-YEAR POSTSECONDARY INSTITUTIONS PRIMARILY ENGAGED IN PROVIDING POSTSECONDARY CAREER AND TECHNICAL EDUCATION, AND THE STATE AGENCY RESPONSIBLE FOR SECONDARY EDUCATION. IF ANY OF THOSE STATE AGENCIES FINDS THAT A PORTION OF THE FINAL STATE PLAN IS OBJECTIONABLE, THAT STATE AGENCY MUST FILE ITS OBJECTIONS WITH THE ELIGIBLE STATE AGENCY. THE ELIGIBLE STATE AGENCY MUST RESPOND TO ANY OBJECTIONS IT RECEIVES IN THE STATE PLAN THAT IT SUBMITS TO THE SECRETARY OF EDUCATION. (SECTION 122(E)(3))

There is one state agency responsible for secondary and postsecondary education. The Pennsylvania Department of Education (PDE) is responsible for secondary career and technical education (CTE), adult CTE, postsecondary CTE and tech prep education. CTE is included in two offices within the PDE. Both offices, Elementary and Secondary Education and Postsecondary and Higher Education, were active members of the state planning committee. The state plan committee agreed on the amount and uses of funds.

II. PROGRAM ADMINISTRATION

1. THE STATE MUST PREPARE AND SUBMIT TO THE SECRETARY A STATE PLAN FOR A 6-YEAR PERIOD; OR YOU MAY PREPARE AND SUBMIT A TRANSITION PLAN FOR THE FIRST YEAR OF OPERATION OF PROGRAMS UNDER THE ACT. (SECTION 122(A)(1))

2. THE STATE MUST DESCRIBE THE CAREER AND TECHNICAL EDUCATION ACTIVITIES TO BE ASSISTED THAT ARE DESIGNED TO MEET OR EXCEED THE STATE ADJUSTED LEVELS OF PERFORMANCE, INCLUDING A DESCRIPTION OF—

A. THE CAREER AND TECHNICAL EDUCATION PROGRAMS OF STUDY, THAT MAY BE ADOPTED BY LOCAL EDUCATIONAL AGENCIES AND POSTSECONDARY INSTITUTIONS TO BE OFFERED AS AN OPTION TO STUDENTS (AND THEIR PARENTS AS APPROPRIATE) WHEN PLANNING FOR AND COMPLETING FUTURE COURSEWORK, FOR CAREER AND TECHNICAL CONTENT AREAS THAT—

a. Incorporate secondary education and postsecondary education elements;

b. Include coherent and rigorous content, aligned with challenging academic standards, and relevant career and technical content in a coordinated, non-duplicative progression of courses that align secondary education with postsecondary education to adequately prepare students to succeed in postsecondary education

c. May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits; and

d. Lead to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree

A one–year Transition Plan was submitted and approved for 2007–2008. This plan is a five–year plan and covers the years of operation July 1, 2008 – June 30, 2013.

The Pennsylvania Department of Education (PDE) will ensure during the implementation of the five–year plan all school entities receiving funds through Perkins IV will have, at minimum, at least one “Program of Study.” The local plan guidelines will include the requirement of Perkins IV legislation and the contract approval process will require evidence of, at minimum, one “Program of Study.”

The existing CTE program approval system requires secondary entities to submit secondary and postsecondary scope and sequence. Articulated credits are submitted as part of the approval process. The current program approval system does request that secondary schools evidence in the program approval request the secondary and postsecondary education elements.

In consultation with PDE’s state level development committee, both secondary and postsecondary entities are required to identify their respective partners and to ensure the components at the secondary and postsecondary levels are aligned. PDE has existing statewide committees developed during the “transition year” having the following required representations: secondary academic and technical instructors, postsecondary academic and technical faculty, counselors and college admissions, business and industry, trade associations and professional associations.

The Pennsylvania Department of Education will develop and make available a scope and sequence by Pennsylvania's Targeted Industry Cluster. http://www.paworkstats.pa.gov. Each recommended scope and sequence will evidence secondary planned academic and technical courses aligned to the postsecondary general education requirements, with the technical courses articulated according to the state authorized articulation agreement. The purpose of all secondary programs, as noted in Pennsylvania's legislated Chapter 4 regulations, is to establish rigorous academic standards and assessment to facilitate the improvement of student achievement… (Levin, 2003, p. 1221). Research has evidenced that Pennsylvania's academic standards will lead to college preparedness. PDE monitors all approved career and technical education programs currently and will continue to monitor them during the Perkins IV authorization to insure the integration of academic standards across CTE content area and the academic course sequencing. The "Programs of Study" (POS) ensure the secondary planned academic and technical courses are aligned to the postsecondary general education and technical courses.

Tech Prep "Programs of Study" historically have been designed to provide students with a nonduplicative sequence of courses consisting of at least two years of secondary education and two years of postsecondary education. This "Program of Study" was developed between participants in the Tech Prep consortium and operates under an articulation agreement. Existing Tech Prep programs will be revisited to ensure the secondary planned academic and technical courses are aligned to the postsecondary general education and technical courses.

The Pennsylvania Department of Education in cooperation with Perkins recipients and stakeholders will coordinate the development of "Programs of Study" that meet Perkins IV requirements. On an ongoing basis, PDE will develop, evaluate and update "Programs of Study" aligned with state designated "High Priority" occupations during the five year authorization period

State Board of Education regulations require all school districts and career and technical centers in the design of their educational programs to provide for the attainment of the academic standards. Attainment of the academic standards requires students to demonstrate the acquisition and application of knowledge. School districts and CTCs shall prepare students to attain academic standards in 12 content areas, which include mathematics, reading, writing, speaking and listening as well as career education and work. School districts and CTCs develop a local assessment plan that includes a description of how the academic standards will be measured and how information from the assessments is used to assist students having difficulty meeting the academic standards. (Levin, 2003, p. 1224)

Pennsylvania has in place a statewide assessment for Math, Science, Reading and Writing. The State assessment system was designed to determine the degree to which school programs enable students to attain proficiency of academic standards and provide results to school districts and CTCs. (Levin, 2003, p. 1232) The State assessments shall be administered annually and levels of proficiency shall be advanced, proficient, basic and below basic (p. 1233).

The State Board of Education recently adopted Academic Standards, Career Education and Work (CEW). The CEW standards will assist all students, K–12, to assess their educational opportunities and academic achievement in light of their chosen career path(s). Local plans will evidence how schools are integrating the standards and assisting students with career pathways through the development of individualized career plans and career portfolios.

Postsecondary entities are involved as the "Programs of Study" are developed. Their role is to serve on the statewide committees that identify the technical standards that cover secondary to

postsecondary completion. This involvement assures that the technical content is nonduplicative. They also review the State Board of Education academic standards and ensure there is alignment of secondary academic standards to the postsecondary general education courses. The academic standards and general education courses are aligned to the technical content and occupations related to each “Program of Study.”

State legislation provides state funds to support dual enrollment activities. Funds are awarded competitively and support academic dual enrollment activities. Dual enrollment activities are for high school students to take college–level, credit–bearing courses at local community colleges and four–year colleges and universities. These courses will also count towards high school graduation requirements. Pennsylvania’s dual enrollment program also emphasizes early college, middle college and gateway to college programs. State funds are targeted to at–risk students and academically challenged school districts. Career and technical schools are eligible to apply for these state funds.

Pennsylvania Department of Education standards for career and technical education also assure that students enrolled in secondary career and technical education will have the occasion to participate in opportunities where college credit is awarded for postsecondary coursework during high school.

The State program approval system for career and technical education programs ensures all programs are aligned with industry standards where applicable. All “Programs of Study” must align with industry credentials or certificates at the secondary level. This is evidenced upon the State’s approval of the program. As the “Programs of Study” are implemented, the postsecondary recipients will also align with industry credentials where appropriate and applicable.

The “Program of Study” is itself aligned to industry credentials. The statewide committee comprised of business, industry and trade associations, will identify appropriate and related industry credentials and certifications. The statewide committee will also identify the appropriate opportunity for a student enrolled in a “Program of Study” to obtain the credential or certificate.

In addition, An Industry Certification Resource Guide was developed by the State utilizing the state identified statewide and regional high demand/skill wage occupations, as well as the PDE approved lists of industry–recognized certifications for Career and Technical Education programs currently used by the CTCs within the Commonwealth. This resource guide will also be used by the postsecondary entities in identifying program areas that align to this need of industry recognized credentials and certifications.

B. HOW THE STATE, IN CONSULTATION WITH ELIGIBLE RECIPIENTS, WILL DEVELOP AND IMPLEMENT THE CAREER AND TECHNICAL PROGRAMS OF STUDY DESCRIBED IN (A) ABOVE;

PDE has developed statewide committees to develop and implement “Programs of Study” defined by classification of instruction (CIP) and the Department of Labor’s designated “High Priority” occupations derived from Pennsylvania’s Targeted Industry clusters. The committees have the following required representations: secondary academic and technical instructors, postsecondary academic and technical faculty, counselors and college admissions, business and industry, trade associations and professional associations.

During the transition year, the PDE identified a statewide ad hoc committee to discuss a template for the “Programs of Study.” The committee developed a “Program of Study” template that all funded recipients must follow during the five year authorization period to develop at least one “Program of Study”.

The “Programs of Study” template requires that the programs be based on national databases such as O*Net, VTECs, MAVCC and state and national certifications, industry skill standards and licensing boards, as applicable. The “Programs of Study” serve as the basis for alignment to the classification of instructional program (CIP) titles and identifies related occupational end of program assessments, industry certifications and specific student outcomes at secondary and postsecondary levels.

C. HOW THE STATE WILL SUPPORT ELIGIBLE RECIPIENTS IN DEVELOPING AND IMPLEMENTING ARTICULATION AGREEMENTS BETWEEN SECONDARY EDUCATION AND POSTSECONDARY EDUCATION INSTITUTIONS;

The Office of Elementary and Secondary Education continues to work with the Office of Postsecondary and Higher Education to evaluate the implementation of the (POS) statewide articulation agreement. The template for the statewide articulation agreement was developed during Perkins III. As each “Program of Study” is developed, the statewide committee develops and finalizes the statewide articulation agreement that is specific to the “Program of Study.”

Because the “Program of Study” covers secondary and postsecondary levels, the statewide committee has identified the appropriate alignment of the related industry recognized credentials and certifications. If the student earns a credential or certification at the secondary level, the articulation agreement will recognize student achievement of the credential through articulated credit. The agreement also recognizes student achievement of proficiency on the state academic assessment.

As the PDE approved and supported statewide committees meet to identify the secondary and postsecondary academic and technical standards, the committees will also identify the courses that will articulate as transferred credit. The support that PDE provides to the eligible recipients in developing and implementing the articulations agreements will be phased in during “Program of Study” development. . The PDE will work with the Tech Prep consortia annually to ensure the implementation of the “Programs of Study” in their assigned regions is achieved. This support includes meeting with the Tech Prep consortia members, providing technical assistance and professional development.

D. HOW PROGRAMS AT THE SECONDARY LEVEL WILL MAKE AVAILABLE INFORMATION ABOUT CAREER AND TECHNICAL PROGRAMS OF STUDY OFFERED BY ELIGIBLE RECIPIENTS;

Current State Board of Education regulation requires that career and technical education courses shall be developed in a planned instruction format and shall be accessible to all high school students attending those grades in which career and technical education courses are offered. All students and their parents or guardians shall be informed of the students’ rights to participate in career and technical education programs and courses. Recipients of federal Perkins funds will provide program information to students at least one year prior to the start of the program year at the career and technical center.

The State Board of Education has also adopted the academic standards of Career Education and Work. The standards address career awareness and preparation, career acquisition, career retention and advancement and entrepreneurship for all students beginning at the elementary grades and continuing through to the twelfth grade. Students are to develop career plans and career portfolios.

Each “Program of Study” follows a scope and sequence that was developed by the statewide committees. The scope and sequence outlines the required academic and technical coursework at the secondary and postsecondary levels. Schools place the scope and sequence in student course selection guides currently. By establishing identified “Programs of Study,” the individual student will be able to plan and develop an education plan to incorporate his/her targeted career objective.

The state is supporting various statewide professional development and technical assistance efforts to strengthen career counseling. These efforts include development of an online toolkit to implement PA Career Education and Work Standards and launch PDE’s new PA Career Zone. In addition, PDE will provide on–going professional development opportunities focused on “Career Pathways” aligned with “Programs of Study.” The toolkits will include each “Program of Study” with associated scope and sequences.

E. THE SECONDARY AND POSTSECONDARY CAREER AND TECHNICAL EDUCATION PROGRAMS TO BE CARRIED OUT, INCLUDING PROGRAMS THAT WILL BE CARRIED OUT BY YOU, TO DEVELOP, IMPROVE, AND EXPAND ACCESS TO APPROPRIATE TECHNOLOGY IN CAREER AND TECHNICAL EDUCATION PROGRAMS;

This agency will use funds to support school entity purchase of appropriate technology for the purpose of training students in approved “Programs of Study” that align with State identified “High Priority Occupations.”

According to Chapter 4, a school district or CTC administering career and technical education programs will appoint a local advisory committee and occupational advisory committees shall be established for each CTE program offered at the school district or CTC. The Occupational Advisory Committee (OAC) is comprised of business and industry representatives. The purpose of the OAC is to verify that the programs meet industry standards, licensing board criteria where applicable and that students are prepared with occupational related competencies. The OAC also provides advice on the curriculum, “Program of Study,” instructional tools and equipment, safety requirements and program evaluation. This ensures that each program has the appropriate technology in place. (Levin, 2003, p. 1231)

PDE reviews each secondary school that has approved career and technical education programs according to state regulation. During the approved program review, PDE staff ensures that the OAC is a viable and active committee and the local advisory committee and school administration address the recommendations of the committee.

Annually, 20 percent of the underperforming Perkins funded recipients will be selected for on–site compliance technical assistance visits based on the following criteria: most recent validated performance data putting the program at risk of non–compliance with Perkins performance measures as identified in the FAUPL; mismanagement of the plan as evidenced by guideline violations in regards to timely submission of the annual application, performance assessment, program data and fiscal reporting. In addition: of the 20% of programs selected annually for on–site

reviews, one–third of the lowest performing consortiums will be required to participate in BCTE determined professional development, technical assistance workshops, conferences and related CTE improvement activities. The state Perkins Five Year Plan requires each secondary and postsecondary eligible agency to organize and operate a Participatory Planning Committee (PPC). The purpose of the PPC is to provide advice on the “Programs of Study,” instructional tools and equipment, program evaluation, professional development and related required uses of funds as outlined in the Perkins Local Plan guidelines. The committee ensures that technology is addressed in the offering of the postsecondary portion of the “Program of Study.”

During technical assistance and monitoring reviews, PDE staff will evaluate the effectiveness of the PPC to ensure committee recommendations are shared with LEA administration.

The State approved program reviews also ensure that the programs are meeting the State’s program standards. The program standards are a means of verifying the quality of every career and technical education program provided by the local entities by ensuring that they meet the established standards. It allows the local entities to review their programs and systems and establish goals for improvement to meet the standards. Areas covered by the standards review cover Program Planning, Curriculum Development and Offering, Guidance Plans and Services, Personnel Qualifications and Learning–Centered Facilities and Equipment and Organizational Performance Results. This process involves faculty, staff, student and the public/community. The process that is used is one of continuous improvement, which means it focuses on educational systems and examines the results. The review ensures each “Program of Study” offers quality programming, including the use of industry–relevant instructional equipment and technology.

F. THE CRITERIA THAT YOU WILL USE TO APPROVE ELIGIBLE RECIPIENTS FOR FUNDS UNDER THE ACT, INCLUDING CRITERIA TO ASSESS THE EXTENT TO WHICH THE LOCAL PLAN WILL—

i. Promote continuous improvement in academic achievement;

ii. Promote continuous improvement of technical skill attainment; and

iii. Identify and address current or emerging occupational opportunities

Data is collected by school entity at the secondary and postsecondary level. This data is also collected by “Program of Study” (specific CIP). Local entities have access to student level data. Data at the State level will be examined and compared to the negotiated levels between the State and USDOE and the negotiated levels between the local entities and the State. Review of the data will allow the State to assess the extent local plan activities are achieving continuous improvement in academic achievement.

The local plan requires recipients to indicate how they will promote continuous improvement. The review criteria will examine the activities and connection to research based practices. The reviewers will ensure eligible recipients are utilizing research based practices and the entities are meeting or making progress toward established performance levels. Pennsylvania uses the NCLB Adequate Yearly Progress academic targets on Reading, Writing and Math state assessments for the secondary recipients. Postsecondary accountability measures do not include academic proficiency as a measure. The current data collection system is under revision and by the end of Perkins IV, the system will reflect required data elements. The data elements will include data that allows for analysis that evidences continuous improvement at the postsecondary level.

This response is similar to (i), but has an emphasis on technical skill attainment. Data is collected by recipient at the secondary and postsecondary level. This data is also collected by “Program of Study” (specific CIP). Local entities have access to student level data. Data at the State level will be examined and compared to the negotiated levels between the State and USDOE and the negotiated levels between the local entities and the State. Review of the data will allow the State to assess the extent local plan activities are achieving continuous improvement in technical achievement. At the secondary level, Pennsylvania uses PDE approved end of program assessments and establishes cut scores annually for each occupational area assessment.

During the term of Perkins IV, the State will work with postsecondary entities to identify appropriate and available industry recognized assessments that will measure postsecondary technical achievement. The postsecondary technical standards will be identified during the development of the “Programs of Study.” The identification of technical standards will serve as the basis of the technical skills to measure.

The statewide business and industry committee will identify the relevant technical standards. The statewide “Program of Study” committees will align the technical standards secondary through postsecondary. The statewide articulation agreement will ensure technical standards and student proficiency at the secondary level are recognized.

Programs must align with national industry standards where applicable. The statewide committees will identify applicable industry standards and credentialing opportunities and align the technical standards to the industry standards. The State will review the “Programs of Study” to ensure the technical coursework is aligned with the recognized industry standards or credentialing opportunities and has been validated by a viable statewide occupational advisory committee.

Data associated with the performance indicator, 2S1 Technical Skill Attainment, is collected annualy. The State has collected data related to this indicator as part of Perkins III. Currently, PDE examines the number of career and technical education concentrators who successfully achieve competency levels at or above the competent level on PDE approved job ready assessments and who complete the PDE approved occupational tests in the reporting year.

New to the data collection is 1P1 Technical Skill Attainment. The current data collection system needs to change in order to collect relevant data. Until the change occurs, the State will use grade point average. Once the data collection system changes and assessments designed, the State will be able to measure continuous improvement at the postsecondary level.

The local plan submission will be reviewed to ensure the eligible recipients are addressing “High Skill/Wage/Demand/Priority Occupations.” The State has conducted analysis of state economic and labor market data and identified occupations that are considered “High Priority” established by regional Workforce Investment Boards (WIB’s). High priority means the occupation will lead to economic growth for the state and nation and will provide opportunity for employment at a life sustaining wage.

Pennsylvania Departments of Labor and Industry and Education have worked together to identify a valid and reliable CIP/SOC crosswalk. All recipients are to align the “Programs of Study” with the “High Priority Occupations” identified by the Pennsylvania Department of Labor and Industry. The State will only approve requests for new “Programs of Study” as long as the programs are aligned with State identified “High Priority Occupations” or meet the State criteria for “High Priority Occupations.”

Community colleges apply for the Economic Development Stipend. This state supported reimbursement program supports only those programs aligned to “High Priority Occupations” including emerging occupational opportunities.

In some cases, statistical analysis and projections can miss differences and dynamics in regional and local labor markets. In order to ensure that the “High Priority Occupations” list has appropriate input from regional businesses, the following mechanism was put in place in order to obtain local input.

It is important for all career and technical education institutions to be aware of this process and get involved as is appropriate, if a local emerging occupation is not reflected in the regional “High Priority Occupations” list. Information on the ‘appeal process’ is available at www.paworkforce.state.pa.us . Local Workforce Investment Board (LWIB) Directors are key contact for the petition process and should be contacted to initiate such a process.

G. HOW PROGRAMS AT THE SECONDARY LEVEL WILL PREPARE CAREER AND TECHNICAL EDUCATION STUDENTS, INCLUDING SPECIAL POPULATIONS, TO GRADUATE FROM SECONDARY SCHOOL WITH A DIPLOMA

With the adoption of the State Board of Education academic standards of Career Education and Work, all students K–12 are to have a career plan. The State has developed online toolkit and professional development opportunities to assist local entities in implementing the standards. The local entities are to teach, challenge and support every student to realize his or her maximum potential and to acquire the knowledge and skills needed for career awareness and preparation, career acquisition, career retention and advancement and entrepreneurship.

As the students move through the educational system, they are to develop career plans. The “Program of Study” ensures that all career and technical education students will follow a rigorous academic sequence of courses while gaining in–depth technical training that prepares them for profitable employment or college as required by state school code regulation. The “Program of Study” includes aligned secondary and postsecondary coursework. This alignment ensures students will graduate prepared to enter the workforce or to continue into the postsecondary component of the “Program of Study.”

According to Chapter 4, the record of a student enrolled in a CTE program shall include the student’s educational and occupational objectives and the results of the assessment of student competencies. Chapter 4 also notes that CTE courses shall include content based upon occupational analysis, clearly stated performance objectives deemed critical to successful employment and assessment of student competencies based upon performance standards. (Levin, 2003, p. 1231)

The State provides financial resources and technical assistance to support schools in meeting the needs of special populations’ students. In addition, the State supported and approved teacher education programs provide instruction in addressing the needs of special populations in the pre–service and in–service programs.

H. HOW SUCH PROGRAMS WILL PREPARE CAREER AND TECHNICAL EDUCATION STUDENTS, INCLUDING SPECIAL POPULATIONS, ACADEMICALLY AND TECHNICALLY FOR OPPORTUNITIES IN POSTSECONDARY EDUCATION OR ENTRY INTO HIGH-SKILL, HIGH-WAGE, OR HIGH-DEMAND OCCUPATIONS IN

CURRENT OR EMERGING OCCUPATIONS, AND HOW PARTICIPATING STUDENTS WILL BE MADE AWARE OF SUCH OPPORTUNITIES;

The local plan guidelines include the requirements of the “Program of Study,” statewide articulation agreement, Pennsylvania academic standards, technical skill credentialing and “High Priority Occupations.” Assurance will be given by the recipients that the “Programs of Study” also meet State Board of Education regulations and Department of Education career and technical education standards. Both the regulations and standards require equal access and support services for students identified in special populations categories.

Funds support programs that align with the Pennsylvania Department of Labor and Industry identified industry clusters and “High Priority Occupations,” or entry into high–skill, high–wage and high–demand occupations. Other criteria identified in funding guidelines include: (a) improving career and technical education students’ occupational and academic knowledge and skills required to perform successfully in high–priority, high–demand, high–wage, high–skill positions; (b) gaining industry credentials and/or eligibility to sit for credentialing exams, which provide skills portability and career mobility by enhancing lateral and upward career moves and (c) developing partnerships and linkages with business, industry, labor and community groups.

In order for local entities to receive approved career and technical education program status, the entity must evidence a labor market analysis and use of an occupational analysis and alignment with “High Priority Occupations” and postsecondary opportunities. The “Program of Study” must address the state recommended academic standards. This will ensure all students, including special populations enrolled in “Programs of Study,” are prepared for “High Priority Occupations” or emerging occupations. The data is submitted to the State for review. The entities not meeting the requirements will not receive approved program status.

State Board of Education and Pennsylvania Department of Education regulations require all “Programs of Study” to address Pennsylvania academic standards and assess student achievement in the areas of academic and technical competence. Through on–site reviews, compliance monitoring and review of requests for program approval status; the State will ensure students, including special populations, will be prepared academically and technically for profitable employment and postsecondary education. The State recommends academic coursework that is focused on career and postsecondary preparation and has been identified by research as appropriate for postsecondary enrollment and employment. The State reviews the basis for program development and determines if the Occupational Advisory Committee has been active in the occupational analysis, curriculum revision and instructional tools/equipment requirements. The review also ensures that recipients are providing appropriate support services, counseling services and equal access. Best practices in this area have been identified.

I. HOW FUNDS WILL BE USED TO IMPROVE OR DEVELOP NEW CAREER AND TECHNICAL EDUCATION COURSES—

i. At the secondary level that are aligned with rigorous and challenging academic content standards and student academic achievement standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended;

ii. At the postsecondary level that are relevant and challenging; and

iii. That lead to employment in high-skill, high-wage, or high-demand occupations;

Eighty–five percent of the Perkins funds are allocated to local education agencies, both secondary and postsecondary, to improve, expand or modify existing programs or implement new programs where existing programs do not meet educational and training needs. Of the 85 percent local allocation amount, 70 percent of the funds are allocated to secondary entities.

Eligible secondary entities applying for Perkins IV funds will submit a five year local plan that covers July 1, 2008 – June 30, 2013, with annual updates to the Budget and Action Plans. The Perkins Local Plan Guidelines are attached (Attachment 1). Each local entity shall include and describe in their plan the following:

1. How the career and technical education programs will be carried out with Perkins IV funds; 2. How the career and technical education activities will be carried out with respect to meeting State and local adjusted levels of performance; 3. How the eligible recipient will (a) offer the appropriate courses of not less than one of the career and technical "Programs of Study," (b) improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs to ensure learning in (i) the core academic subjects and (ii) career and technical education subjects, (c) provide students with strong experience in and understanding of all aspects of an industry, (d) ensure that students who participate in such career and technical education programs are taught the same coherent and rigorous content aligned with challenging academic standards as are taught to all other students and (e) encourage career and technical education students at the secondary level to enroll in rigorous and challenging courses in core academic subjects; 4. How comprehensive professional development for career and technical education, academic, guidance and administrative personnel will be provided that promotes the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education; 5. How parents, students, academic and career and technical education teachers, faculty, administrators, career guidance and academic counselors, representatives of tech prep consortia, representatives of the entities participating in activities described in Section 117 of Public Law 105–220 (if applicable), representatives of business and industry, labor organizations, representatives of special populations and other interested individuals are involved in the development, implementation and evaluation of career and technical education programs assisted under this title, and how such individuals and entities are effectively informed about, and assisted in, understanding the requirements of this title, including career and technical "Programs of Study"; 6. Provide assurances that the eligible recipient will provide a career and technical education program that is of such size, scope and quality to bring about improvement in the quality of career and technical education programs; 7. The process that will be used to evaluate and continuously improve the performance of the eligible recipient; 8. How the eligible recipient will (a) review career and technical education programs and identify and adopt strategies to overcome barriers that result in lowering rates of access to or lowering success in the programs for special populations; (b) provide programs that are designed to enable the special populations to meet the local adjusted levels of performance and (c) provide activities to prepare special populations, including single parents and displaced homemakers, for high–skill, high–wage or high–demand occupations that will lead to self–sufficiency; 9. How individuals who are members of special populations will not be discriminated against on the basis of their status as members of special populations; 10. How funds will be used to promote preparation for nontraditional fields; 11. How career guidance and academic counseling will be provided to career and technical education students, including linkages to future education and training opportunities and 12. Efforts to improve (a) the recruitment and retention of career and technical education teachers, faculty and career guidance and academic counselors, including individuals in groups underrepresented in the teaching

profession and (b) the transition to teaching from business and industry. (Perkins IV, S. 250–50 to S. 250–52)

Comprehensive professional development, which includes initial teacher preparation for career and technical, academic, guidance and administrative personnel, will be provided through planned scheduled seminars, workshops, conferences and courses in accordance with the objectives.

The Pennsylvania State Department of Education's Bureau of Career and Technical Education has developed and implemented a comprehensive professional personnel development program by working with universities to establish Professional Personnel Development Centers. The Centers were established and approved by the Pennsylvania State Board of Education on July 1, 1978. The Centers are located at Indiana University of Pennsylvania, The Pennsylvania State University and Temple University. The mission of each Center is to provide comprehensive regional professional personnel development for career and technical educators and administrators that are specifically designed to prepare, update and upgrade career and technical teachers, administrators and other career and technical education support personnel. The Centers provide a wide range of professional personnel development activities for career and technical educators.

During 2006–2007, the Centers provided pre–service and in–service professional development for approximately 12,000 prospective and current career and technical educators. The following is a partial listing of the required use of funds that are also major functions of the Centers:

1. Provide Center management for career and technical professional personnel development. 2. Develop and maintain a comprehensive Occupational Competency Assessment (OCA) program. 3. Provide outreach services (Vocational Intern/Instructional Certification Program) for personnel off–campus through traditional undergraduate courses. 4. Provide outreach services (Vocational Intern/Instructor/Coordinator and Cooperative Education Certification Programs for personnel off–campus through Field–Based Competency–Based Teacher Education (FB–CBTE). 5. Provide outreach services (Vocational Administrative, Supervisory and Teacher Leadership) for personnel off–campus through traditional graduate courses and Field–Based Competency–Based Leadership Training (FB–CBLT). 6. Provide continuing technical and professional development, including workshops, seminars and academies for all personnel involved in vocational programming. 7. Provide pre–induction, professional education for clients recruited from business, industry and the health occupations with little or no pedagogical education or experience. 8. Provide an occupational experience program. 9. Provide placement services for career and technical education professional personnel. 10. Provide a recruitment system for career and technical education teachers and leadership personnel. 11. Assist schools with the selection, development, dissemination and implementation of "Programs of Study" that include rigorous academics and industry based career and technical content. The "Programs of Study" provide a nonduplicative sequence of courses that align secondary and postsecondary instructional programs. 12. Provide assistance for career and technical educators who serve special populations as defined in Perkins IV.

The Professional Personnel Development Centers guidelines are provided in Attachment 2.

Eighty–five percent of the Perkins funds are allocated to local education agencies both secondary and postsecondary to improve, expand or modify existing programs or implement new programs where existing programs do not meet educational and training needs. Of the 85 percent local allocation amount, 30 percent of the funds are allocated to postsecondary entities.

Eligible postsecondary entities applying for Perkins IV funds will submit a local plan that covers July 1, 2008 – June 30, 2013. The Perkins Local Plan Guidelines are attached (Attachment 1). Each local entity shall include in their local plan the following:

1. How the career and technical education programs will be carried out with Perkins IV funds; 2. How the career and technical education activities will be carried out with respect to meeting State and local adjusted levels of performance; 3. How the eligible recipient will (a) offer the appropriate courses of not less than one of the career and technical "Programs of Study," (b) improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs to ensure learning in (i) the core academic subjects and (ii) career and technical education subjects, (c) provide students with strong experience in and understanding of all aspects of an industry, (d) ensure that students who participate in such career and technical education programs are taught to the same coherent and rigorous content aligned with challenging academic standards as are taught to all other students and (e) encourage career and technical education students at the secondary level to enroll in rigorous and challenging courses in core academic subjects; 4. How comprehensive professional development for career and technical education, academic, guidance and administrative personnel will be provided that promotes the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education; 5. How parents, students, academic and career and technical education teachers, faculty, administrators, career guidance and academic counselors, representatives of tech prep consortia, representatives of the entities participating in activities described in Section 117 of Public Law 105–220 (if applicable), representatives of business and industry, labor organizations, representatives of special populations and other interested individuals are involved in the development, implementation and evaluation of career and technical education programs assisted under this title, and how such individuals and entities are effectively informed about, and assisted in understanding the requirements of this title, including career and technical "Programs of Study"; 6. Provide assurances that the eligible recipient will provide a career and technical education program that is of such size, scope and quality to bring about improvement in the quality of career and technical education programs; 7. The process that will be used to evaluate and continuously improve the performance of the eligible recipient; 8. How the eligible recipient will (a) review career and technical education programs and identify and adopt strategies to overcome barriers that result in lowering rates of access to, or lowering success in, the programs for special populations; (b) provide programs that are designed to enable the special populations to meet the local adjusted levels of performance and (c) provide activities to prepare special populations, including single parents and displaced homemakers, for high–skill, high–wage or high–demand occupations that will lead to self–sufficiency; 9. How individuals who are members of special populations will not be discriminated against on the basis of their status as members of special populations; 10. How funds will be used to promote preparation for nontraditional fields; 11. How career guidance and academic counseling will be provided to career and technical education students, including linkages to future education and training opportunities and 12. Efforts to improve (a) the recruitment and retention of career and technical education teachers, faculty and career guidance and academic counselors, including individuals in groups underrepresented in the teaching profession and (b) the transition to teaching from business and industry. (Perkins IV, S. 250–50 to S. 250–52)

The State has followed a policy that the best means of preparing secondary career and technical education completers for opportunities in postsecondary education and/or entry into high–priority, high–skill, high–wage, high–demand occupations is to have the students complete a rigorous

planned sequence of academic and technical courses as well as to integrate the academic standards into the technical courses. Secondary program approval criteria include a description of both the academic and technical course sequence at the secondary and postsecondary levels. The approval system also requires submission of articulated courses.

Local plan guidelines require assurances that career and technical education programs at the secondary and postsecondary level are aligned with “High Priority Occupations.” “High Priority Occupations” are identified by the Pennsylvania Department of Labor and Industry and are updated on an annual basis. The program approval process developed by the State ensures that all “Programs of Study” are aligned with “High Priority Occupations.” The program approval process includes an on–site review process to ensure the entity conducts labor market and occupational analysis, and aligns with “High Priority Occupations” and postsecondary opportunities.

The State also requires postsecondary entities offering career and technical education programs to align with “High Priority Occupations.” The State reimbursement for such programs is provided to only programs that prepare graduates for “High Priority Occupations.”

J. HOW YOU WILL FACILITATE AND COORDINATE COMMUNICATIONS ON BEST PRACTICES AMONG SUCCESSFUL RECIPIENTS OF TECH PREP PROGRAM GRANTS UNDER TITLE II AND OTHER ELIGIBLE RECIPIENTS TO IMPROVE PROGRAM QUALITY AND STUDENT ACHIEVEMENT

The State sponsors an annual conference that focuses on evidenced–based best practices. One strand at the annual conference is focused on Tech Prep strategies. The State also works with two associations (Pennsylvania Association of Career and Technical Educators, Pennsylvania Association of Career and Technical Administrators) to cosponsor annual conferences, symposiums and regional workshops. In addition, through on–site reviews, technical assistance visits, data review and program approvals, the State identifies the evidenced–based best practices eligible recipients.

To facilitate and communicate evidenced–based best practices, the State will also identify school districts, career and technical education centers and postsecondary institutions that are having difficulties in meeting the Perkins IV indicators. The State will provide resources that will enable the educational entities to improve program quality and student achievement.

Technical assistance to the school districts, career and technical centers and postsecondary institutions includes:

• Assistance in developing a program improvement plan that specifically identifies the strategies, techniques and methods to improve program quality and student achievement. • Assistance in identifying and realigning resources to improve program quality and student achievement. • Assistance in monitoring program quality and progress.

The State staff will analyze each entity’s performance data. Those school districts, career and technical centers and postsecondary institutions with “Programs of Study” that are not meeting the standards will be required to develop a program improvement plan that specifically addresses program improvement and student achievement. Once the State receives the plan, State teams will work with the entity by providing appropriate resources. Dissemination of evidenced–based best practices will also occur through the State’s website.

K. HOW FUNDS WILL BE USED EFFECTIVELY TO LINK ACADEMIC AND CAREER AND TECHNICAL EDUCATION AT THE SECONDARY LEVEL AND AT THE POSTSECONDARY LEVEL IN A MANNER THAT INCREASES STUDENT ACADEMIC AND CAREER AND TECHNICAL ACHIEVEMENT; AND

The State is working with the Tech Prep consortia to identify statewide committees. The statewide committees are comprised of business and industry related to a given “Program of Study.” There are also statewide committees that include representatives from secondary and postsecondary entities. This includes academic and technical instructors and counselors/college admissions. The “Programs of Study” that are developed align secondary and postsecondary academic and technical courses. This alignment lends to articulated credit. The statewide committees will develop an articulation agreement that identifies the areas that can be articulated.

The developed “Program of Study” identifies academic and technical standards relevant for given careers. Once the standards are identified, they are sequenced in a manner that leads to planned courses and nonduplicative sequencing. Each grade level serves as the foundation for the next grade level.

The State adopted academic standards of Career Education and Work also support the development of “Programs of Study,” and individual student career plans. The plans ensure students will graduate from high school prepared to enter into a postsecondary program that meets their career goals.

State Board of Education regulation requires all school districts and career and technical centers to integrate the Pennsylvania academic standards into courses. The State has been providing in–services, conferences, workshops and pre–service sessions on integrating Pennsylvania academic standards into technical content areas. State supported research has also been conducted and results disseminated that evidence integration of academic standards into technical content has led to increased student achievement levels on the state academic assessment.

The State will commit funds through a competitive process to enable the part–time career and technical centers to strengthen the linkage between the part–time career and technical centers and the participating school districts. The efforts will ensure that the participating school districts are meeting the state academic standards and working toward meeting Adequate Yearly Progress for all students, including those students enrolled in the “Programs of Study.”

L. HOW THE STATE WILL REPORT ON THE INTEGRATION OF COHERENT AND RIGOROUS CONTENT ALIGNED WITH CHALLENGING ACADEMIC STANDARDS IN CAREER AND TECHNICAL EDUCATION PROGRAMS IN ORDER TO ADEQUATELY EVALUATE THE EXTENT OF SUCH INTEGRATION. (SECTION 122(C)(1)(A)-(L))

The extent of such integration will be evident during the on–site reviews and compliance monitoring. The local plan reporting documents reflect the extent of compliance with state and federal requirements. In addition, the Consolidated Annual Report (CAR) includes a summary of the extent of integration.

3. THE STATE PLAN MUST DESCRIBE HOW COMPREHENSIVE PROFESSIONAL DEVELOPMENT (INCLUDING INITIAL TEACHER PREPARATION AND ACTIVITIES THAT SUPPORT RECRUITMENT) FOR CAREER AND TECHNICAL TEACHERS,

FACULTY, ADMINISTRATORS, AND CAREER GUIDANCE AND ACADEMIC COUNSELORS WILL BE PROVIDED, ESPECIALLY PROFESSIONAL DEVELOPMENT THAT—

A. PROMOTES THE INTEGRATION OF COHERENT AND RIGOROUS ACADEMIC CONTENT STANDARDS AND CAREER AND TECHNICAL EDUCATION CURRICULA, INCLUDING THROUGH OPPORTUNITIES FOR ACADEMIC AND CAREER AND TECHNICAL TEACHERS TO JOINTLY DEVELOP AND IMPLEMENT CURRICULA AND PEDAGOGICAL STRATEGIES;

Professional Development Centers include academic integration strategies into technical program content in their program requirements.

PDE sponsors an annual conference that is focused on academic and technical integration strategies. The conference is attended by academic and technical instructors of high schools and Career and Technical Education Centers. PDE also sponsors faculty from Perkins eligible postsecondary institutions. PDE provides registration, travel and subsistence costs for the postsecondary faculty attending the conference.

To ensure that sustained professional development is provided, PDE has entered into contract with Southern Regional Education Board (SREB) and EdTrust. Both entities are providing year long training, including coaching activities, at the participating school districts and career and technical centers. SREB is providing training and coaching that assists the part–time career and technical centers with establishing a culture of high expectations and incorporating literacy strategies into the technical education courses. EdTrust is working with school districts and the participating career and technical centers to transform school counseling.

Throughout the term of Perkins IV, PDE will continue to seek additional sustained professional development opportunities and various means of offering the training, such as utilizing technology (Webinars) and regional opportunities with continued assistance through the Commonwealth's intermediate units.

B. INCREASES THE PERCENTAGE OF TEACHERS THAT MEET TEACHER CERTIFICATION OR LICENSING REQUIREMENTS;

In an attempt to increase the percentage of teachers that meet teacher certification or licensing, the Professional Development Centers will work closely with the Career and Technical Education Directors and assist them when possible in identifying highly qualified potential candidates for teaching positions. The school entity administrators and personnel managers will be provided with criteria that will assist them in selecting the best candidate for the available teaching position. Currently recruiting is done by the directors of the career and technical centers. The recruitment is done in collaboration with the Professional Development Centers. Guidelines for certification and recruitment will be readily available. Guidelines for certification are currently found on the PDE Website, www.education.pa.gov

C. IS HIGH QUALITY, SUSTAINED, INTENSIVE, AND FOCUSED ON INSTRUCTION, AND INCREASES THE ACADEMIC KNOWLEDGE AND UNDERSTANDING OF INDUSTRY STANDARDS, AS APPROPRIATE, OF CAREER AND TECHNICAL EDUCATION TEACHERS

Continuing professional education is required in Pennsylvania. To address ongoing professional development, the Commonwealth of Pennsylvania legislated Act 48 for all certified teachers in 1999. Act 48 of 1999 requires all Pennsylvania educators holding Pennsylvania public school certification, including Instructional I and II, Educational Specialist I and II, Administrative, Supervisory, letters of Eligibility and all vocational certificates, to participate in ongoing professional education. Act 48 requires all education professionals to acquire six credits/180 hours/a combination of professional development hours/credits equivalent to 180 hours every five years to maintain an active certificate. Certified educators must enroll in professional development related to pedagogy, content knowledge and skills.

Act 48 applies to all certified education professionals, effective July 1, 2000, or beginning the date a certificate is awarded, whether or not the educator is employed in education.

D. ENCOURAGES APPLIED LEARNING THAT CONTRIBUTES TO THE ACADEMIC AND CAREER AND TECHNICAL KNOWLEDGE OF THE STUDENT;

Career and Technical Education in Pennsylvania at the secondary level is based on contextual (applied) learning. Students enrolled in Career and Technical Education are taking a career major that ranges from 720 to 1,440 hours of instruction in technical education, as well as being exposed to inquiry–based and project based learning.

At the postsecondary level, because the students are enrolled in a career major, the training must include contextual (applied) learning. Students are engaged in demonstrations and project–based instruction.

Both secondary and postsecondary entities work with Occupational Advisory Committees. The Occupational Advisory Committees ensure that learning contributes to the specific occupational needs aligned with the programs. Each program is assigned to a CIP Code.

Pennsylvania also requires all programs to be aligned to industry standards and ensure students are eligible to sit for certification examinations as appropriate and applicable.

E. PROVIDES THE KNOWLEDGE AND SKILLS NEEDED TO WORK WITH AND IMPROVE INSTRUCTION FOR SPECIAL POPULATIONS; AND

PDE has the Pennsylvania Training and Technical Assistance Network (PaTTAN). PaTTAN provides educators, parents and agencies involved in special education with a consistent, statewide network of technical assistance opportunities and services. PaTTAN, with offices in King of Prussia, Harrisburg and Pittsburgh, supports the efforts of the Bureau of Special Education (BSE) to build the capacity of Local Education Agencies to provide appropriate services to children/students who receive Special Education or who are at risk. PaTTAN includes training and onsite support for Early Intervention providers and personnel. These services are collaborated between the Bureau of Special Education and the Office of Child Development, Pennsylvania Department of Public Welfare.

PaTTAN delivers onsite guided practice workshops, team training, publications, distance learning and videoconferencing. PaTTAN's training centers, meeting facilities and support services make it possible for clients to participate in professional development opportunities locally and statewide. Interactive videoconference meetings and trainings link PaTTAN offices to outside sites. Live satellite broadcasts can also be downlinked to multiple sites across the Commonwealth.

PaTTAN works with school district and intermediate unit personnel in Pennsylvania to help them achieve adequate yearly progress for all students, including students with disabilities, as required by the federal "No Child Left Behind Act."

Teacher certification regulations have changed this past year. All CTE 60 credit teacher certification programs must now embed three credits of English language learner and six credits of special needs instruction.

English as a Second Language (ESL) is an instructional program housed within the Bureau of Teaching and Learning Support at the Pennsylvania Department of Education (PDE). As part of curriculum and instruction, professional development for ESL is provided statewide and planned and developed by the ESL/Bilingual Education Advisors at the PDE. Information regarding state sponsored ESL professional development activities can be found on the Web at www.pde.state.pa.us/esl. PDE requires all CTC staff be prepared to work with ESL students and receive ongoing professional development as part of strategic planning and Chapter 4.26 of the PA School Code/BEC.

PDE/BCTE funds a dedicated staff person to promote nontraditional programs at the statewide level. Programs receiving Perkins allocation must document on their annual local plan application the uses of funds to support nontraditional programming. In addition, each program is required to maintain assurances on nontraditional program improvement activities for PDE onsite review.

F. PROMOTES INTEGRATION WITH PROFESSIONAL DEVELOPMENT ACTIVITIES THAT THE STATE CARRIES OUT UNDER TITLE II OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED, AND TITLE II OF THE HIGHER EDUCATION ACT OF 1965, AS AMENDED. (SECTION 122(C)(2)(A)-(G))

Professional development for Career and Technical Education educators and administrators in Pennsylvania is developed and structured through the local education agency's (LEA) Strategic Plan and more specifically within their Professional Education Plan. The Strategic Plan encompasses all aspects of the LEA's vision and direction for a six year period with a Mid–point Review conducted three years into the plan. The Professional Education Plan that is a component of the Strategic Plan is developed by the LEA every three years. All these afore mentioned plans are reviewed and approved by Pennsylvania Department of Education regional directors in accordance with approved state guidelines.

The Professional Education Plan shall include the LEA's proposed plan for providing professional development opportunities for their educators and administrators that include strategies and models to support the integration of the core academic subjects (Math, Science, Language Arts) into each of their career and technical curriculums.

The Pennsylvania Department of Education provides statewide assistance to these LEAs through several initiatives:

The Department also offers online professional development courses at no cost to the educational community that can be utilized by any educator or administrator that holds a Pennsylvania teaching certificate.

Each of the 29 Pennsylvania Intermediate Units provide many professional development courses that are reviewed and approved by the Department's regional directors prior to availability or at time of modification. The intermediate units cooperate with all regional LEAs to develop specific professional development courses that meet the LEA's current needs. Several IUs have developed courses designed to address strategies and models for the integration of core academic subject matter into career and technical curriculum.

The Bureau of Career and Technical Education will also be providing technical assistance to the educational community regarding these efforts.

4. THE STATE MUST DESCRIBE EFFORTS THAT YOUR AGENCY AND ELIGIBLE RECIPIENTS WILL MAKE TO IMPROVE—

A. THE RECRUITMENT AND RETENTION OF CAREER AND TECHNICAL EDUCATION TEACHERS, FACULTY, AND CAREER GUIDANCE AND ACADEMIC COUNSELORS, INCLUDING INDIVIDUALS IN GROUPS UNDERREPRESENTED IN THE TEACHING PROFESSION; AND

In recruitment and retention of CTE teachers, faculty and career counselors PDE will focus on the following:

1) Work closely with administrators and assist them in identifying specific criteria that are associated with success in the classroom setting. 2) Assist the administration in providing career ladders for staff. 3) Work with school based staff in creating a pleasant working environment. 4) Continue to provide pre–induction workshops for new teachers, expand the mentoring program and provide additional in–classroom supporters as appropriate.

Pennsylvania conducted a research based study that examined retention of secondary Career and Technical Center teachers. The findings evidenced that in Pennsylvania there is an older entrant, average age 37, who has attained life skills. Due to the Professional Development Center programs and regulated in education programs, the mentoring and financial support of the school entities ensure that 90 percent of the teachers remain in the teaching profession.

PDE encourages local school districts receiving federal funds to actively recruit teachers from 'underrepresented' groups, which mirror student "special populations" as defined in federal legislation, with the intent of aligning teachers who come from diversified backgrounds (economically disadvantaged, single parent, migrant, ESL, non–traditional, etc.) to these student populations. The PA Department of Education strongly believes a diversified teacher workforce will serve as good role models for students who face similar obstacles.

B. THE TRANSITION TO TEACHING FROM BUSINESS AND INDUSTRY, INCLUDING SMALL BUSINESS. (SECTION 122(C)(3)(A)-(B))

1) Applicants are screened by the administrators and during the screening process, the candidates are given information on the basic requirements and the instructional and certification process. The

Professional Development Centers are contacted by the applicant. 2) The Professional Development Centers provide each candidate with specific instruction as to the process the applicant needs to follow in order to become a teacher. 3) The pre–induction workshops for new teachers focus exclusively on the transition from business/industry to an educational setting. All new candidates (small businesses or large businesses) are provided the same type of assistance. 4) The mentoring programs are another specific effort to address retention. Each new teacher is assigned a mentor that is located within the same school. This is a Pennsylvania requirement for all schools to develop an induction plan and ensure a new teacher is working with a mentor within the district.

5. THE STATE PLAN MUST DESCRIBE EFFORTS THAT THE ELIGIBLE STATE AGENCY AND ELIGIBLE RECIPIENTS WILL MAKE TO IMPROVE THE TRANSITION OF SUBBACCALAUREATE CAREER AND TECHNICAL EDUCATION STUDENTS INTO BACCALAUREATE DEGREE PROGRAMS AT INSTITUTIONS OF HIGHER EDUCATION. (SECTION 122(C)(4))

Pennsylvania's "Programs of Study" shall be in compliance with five template elements, which includes as one of the activities the opportunity for secondary education students to earn postsecondary education credits through dual or concurrent enrollment, articulated credit or other ways leading to a Pennsylvania recognized industry–based credential, credit–bearing certificate, associate or baccalaureate degree. BCTE will work with community college/two–year programs to demonstrate that an articulation agreement exists that enables the student who completes an associate degree and transfers credits earned to an institution of higher education in pursuit of a bachelors degree. Additionally, the Transfer and Articulation provisions of state Act 114, requires the state system universities and community colleges to develop and approve a set of course equivalency standards and 30 credits of foundation–level courses that will be accepted across all state system institutions. Students will not have to repeat the credit–bearing courses at other institutions.

6. THE STATE PLAN MUST DESCRIBE HOW THE ELIGIBLE STATE AGENCY WILL ACTIVELY INVOLVE PARENTS, ACADEMIC AND CAREER AND TECHNICAL EDUCATION TEACHERS, ADMINISTRATORS, FACULTY, CAREER GUIDANCE AND ACADEMIC COUNSELORS, LOCAL BUSINESS (INCLUDING SMALL BUSINESSES), AND LABOR ORGANIZATIONS IN THE PLANNING, DEVELOPMENT, IMPLEMENTATION, AND EVALUATION OF CAREER AND TECHNICAL EDUCATION PROGRAMS IN YOUR STATE. (SECTION 122(C)(5))

The State utilizes numerous means to involve various partners in the development, implementation and evaluation of the Career and Technical Education programs. PDE has established collaborative relations with various state agencies and nonprofit organizations that are focused on workforce development. This includes the PA Partners, PACTEC, Transition Council, PAVSNP, PACTA. Attendance at the meetings held by each organization ensures that their concerns related to Career and Technical Education are heard and policy changes have occurred due to interaction with the various groups. The State has an approved program onsite evaluation process in place. The evaluation process involves establishing a team that visits secondary school entities that hold approved Career and Technical Education programs. The team is comprised of business, postsecondary faculty, career guidance and academic counselors, secondary teachers and administrators. During the review, parents and students are interviewed. The purpose of the review is to ensure quality program offerings are available at the school entity and findings are reported as commendations, recommendations and corrective actions. The school entity submits a plan that

describes how changes will occur. This review examines the connection to postsecondary programs, specifically those operating under an articulation agreement.

7. THE STATE PLAN MUST DESCRIBE EFFORTS THAT THE ELIGIBLE STATE AGENCY AND ELIGIBLE RECIPIENTS WILL MAKE TO—

A. IMPROVE THE ACADEMIC AND TECHNICAL SKILLS OF STUDENTS PARTICIPATING IN CAREER AND TECHNICAL EDUCATION PROGRAMS, INCLUDING BY STRENGTHENING THE ACADEMIC AND CAREER AND TECHNICAL COMPONENTS OF CAREER AND TECHNICAL EDUCATION PROGRAMS THROUGH THE INTEGRATION OF ACADEMICS WITH CAREER AND TECHNICAL EDUCATION TO ENSURE LEARNING IN—

i. The core academic subjects (as defined in section 9101 of the Elementary and Secondary Education Act of 1965, as amended);

ii. Career and technical education subjects;

Reform efforts began in 2005 to ensure improvement in student achievement. Specific activities include regional workshops, revision of the career and technical education approval system and identification of approval requirements.

PDE has aligned CTE programs with statewide high school reform efforts under a state initiative entitled Project 720.

Chapter 4 (PA school code) 4.31. Vocational–Technical Education.

Vocational–technical education programs shall consist of a series of planned academic and vocational–technical education courses that are articulated with one another so that knowledge and skills are taught in a systematic manner. When appropriate, vocational–technical education programs may also include cooperative vocational–technical education and participation in vocational student organizations to develop leadership skills.

Vocational–technical education courses shall include content based upon occupational analysis, clearly stated performance objectives deemed critical to successful employment and assessment of student competencies based upon performance standards. In listing planned instruction in its strategic plan under §4.13 (relating to strategic plans), a school district or AVTS shall indicate which courses meet the requirements of this section.

The Governor’s Office of Administration is requiring an alignment of CTE programs to academic and industry standards. PDE has redirected state funds to support alignment of programs to academic and industry standards.

B. PROVIDE STUDENTS WITH STRONG EXPERIENCE IN, AND UNDERSTANDING OF, ALL ASPECTS OF AN INDUSTRY; AND

The “Programs of Study” will be developed that meet the requirements and are established as a statewide minimum. Please review website for complete roll–out and strategy PA is using to align secondary with postsecondary CTE programs. http://www.education.pa.gov/K–

12/Career%20and%20Technical%20Education/Programs%20of%20Study/Pages/default.aspx.VuCRqlQo7Vg

C. ENSURE THAT STUDENTS WHO PARTICIPATE IN CAREER AND TECHNICAL EDUCATION PROGRAMS ARE TAUGHT TO THE SAME CHALLENGING ACADEMIC PROFICIENCIES AS TAUGHT TO ALL OTHER STUDENTS. (SECTION 122(C)(7)(A)-(C))

CTE curriculum requires joint planning to align academic courses. PDE program approval process ensures program scope and sequence is aligned with regular academic courses per Chapter 4. Technical assistance will be provided to those not meeting the requirements. Evidence based “Best Practices” will be identified and shared with non–performing programs.

8. THE STATE PLAN MUST DESCRIBE HOW THE ELIGIBLE STATE AGENCY WILL PROVIDE LOCAL EDUCATIONAL AGENCIES, AREA CAREER AND TECHNICAL EDUCATION SCHOOLS, AND ELIGIBLE INSTITUTIONS IN THE STATE WITH TECHNICAL ASSISTANCE. (SECTION 122(C)(15))

PDE provides technical assistance to all funded secondary and postsecondary approved programs on an ongoing basis. This occurs at the request of the local entities or is based on a review of data related to the performance measures. Technical assistance workshops will be developed based on LEA needs and PDE assessment of performance data, (e.g., program approval, data submission, assessment administration, counseling, integration of academics into CTE). PDE annually sponsors an : Integrated Learning Conference (ILC); Pennsylvania Career and Technical Education Conference (PACTEC) and Pennsylvania Career and Technical Administrator’s Association (PACTA) conference that is focused on integration of academics into CTE programs, career counseling, secondary to postsecondary alignment and instructional strategies. PDE also supports week long training sessions that focus on academic and technical instructors learning how to integrate Reading and Mathematics Pennsylvania academic standards across the technical content areas.

PDE will identify evidence based “Best Practices” that lead to student success and facilitate collaboration between school entities that need assistance with school entities that are successful. PDE continues to explore additional means of providing sustained Professional Development activities and will do so throughout the term of this grant. PDE is exploring study groups and Webinars as alternative means of providing sustained Professional Development. PDE has entered into agreements with SREB, EdTrust and PACTA. These agencies will provide sustained Professional Development during the Perkins IV Authorization.

Topics for Professional Development will be based on a review of the CAR data, as well as, onsite evaluation reports. The onsite evaluation reports are generated from BCTE’s Approved Program Evaluation (APE) reviews and Perkins IV compliance monitoring visits.

9. THE STATE PLAN MUST DESCRIBE HOW CAREER AND TECHNICAL EDUCATION IN YOUR STATE RELATES TO YOUR STATE’S AND REGION’S OCCUPATIONAL OPPORTUNITIES. (WIOA SECTION 122(C)(16))

All newly approved programs are contingent on preparing students for “High Priority Occupations.” PDE/BCTE coordinates its funding and development of high–priority occupations based on the

Commonwealth's labor market data for local, regional and statewide economic and workforce development sectors as outlined on the PA Workforce Development website at www.dli.pa.gov

10. THE STATE PLAN MUST DESCRIBE THE METHODS THE ELIGIBLE STATE AGENCY PROPOSES FOR THE JOINT PLANNING AND COORDINATION OF PROGRAMS CARRIED OUT UNDER THIS LEGISLATION WITH OTHER FEDERAL EDUCATION PROGRAMS. (SECTION 122(C)(17))

Reform efforts since 2005 are aligned. The goal is to develop a K–12+ system.

11. THE STATE PLAN MUST PROVIDE A DESCRIPTION AND THE INFORMATION SPECIFIED "IN SUBPARAGRAPHS (B) AND (C)(III) OF SECTION 102(B)(2), AND, AS APPROPRIATE, SECTION 103(B)(3)(A), AND SECTION 121(C), OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (PUBLIC LAW 113-128) CONCERNING THE PROVISIONS OF SERVICES ONLY FOR POSTSECONDARY STUDENTS AND SCHOOL DROPOUTS. (SECTION 122(C)(20))

BCTE has been working with PDE's Office of Postsecondary and Higher Education's Bureau of Adult Basic Literacy Education (ABLE) through the release and assignment of incentive grant funds generated during the Perkins III authorization to directly fund and implement ABLE program initiatives. BCTE has also assisted higher education to develop and pilot a monitoring tool to track ACT 101 (a state funded program to support at risk postsecondary students with academic remediation and career counseling) progress, as well as, identifying strengths and needs of the program.

PROGRAM ADMINISTRATION

1. THE STATE PLAN MUST PROVIDE A WEB LINK TO THE ELIGIBLE STATE AGENCY'S LOCAL APPLICATIONS OR PLANS FOR SECONDARY AND POSTSECONDARY ELIGIBLE RECIPIENTS, WHICH WILL MEET THE REQUIREMENTS IN SECTION 134(B) OF THE ACT.

See Attachment 1, Local Plan Guidelines.

2. THE STATE PLAN MUST PROVIDE A DESCRIPTION OF THE STATE'S GOVERNANCE STRUCTURE FOR CAREER AND TECHNICAL EDUCATION.

State Board of Education to the Secretary of Education to the Deputy Secretary, Office of Elementary and Secondary Education to the Bureau of Career and Technical Education to the Division of Data Analysis, Assessment and Contracts, Division of Professional Development and Support Services, Division of Program Standards and Quality Assurances, Division of Adult and Postsecondary CTE

The approximate number of eligible secondary recipients is 120 school entities and 40 postsecondary institutions programs.

3. THE STATE PLAN MUST PROVIDE A DESCRIPTION OF THE ROLE OF POSTSECONDARY CAREER AND TECHNICAL EDUCATION IN THE ONE-STOP CAREER CENTER DELIVERY SYSTEM ESTABLISHED BY TITLE I OF WIOA.

In Pennsylvania, postsecondary career and technical education is an important component in the services of the one–stop career center delivery system established by Title I of WIA. Postsecondary Perkins funded programs partner directly with regionally based one–top CareerLink Centers established by the Department of Labor to coordinate the development of postsecondary career and technical education programs which complement Title 1 activities to prepare adult students for high–priority, high–skill, high–wage and high–demand occupations. The following is a listing of collaborative activities:

• Job search and placement assistance • Labor market information • Initial assessment of skills and needs • Information about available jobs • Comprehensive assessments • Development of individual employment plans • Group and individual counseling • Case management • Short–term pre–vocational services • Training services which are directly linked to job opportunities in their local area • Occupational skills training • On–the–job training • Entrepreneurial training • Skill upgrading • Job readiness training • Adult education and literacy activities

III. PROVISION OF SERVICES FOR SPECIAL POPULATIONS

1. YOU MUST DESCRIBE YOUR PROGRAM STRATEGIES FOR SPECIAL POPULATIONS LISTED IN SECTION 3(29) OF THE ACT, INCLUDING A DESCRIPTION OF HOW INDIVIDUALS WHO ARE MEMBERS OF THE SPECIAL POPULATIONS—

A. WILL BE PROVIDED WITH EQUAL ACCESS TO ACTIVITIES ASSISTED UNDER THE ACT.

Secondary and Postsecondary Strategies The agency’s strategy for special populations is in strict compliance with all laws and regulations for special populations and in developing the potential of each individual to become an independent adult, economically, financially and socially. This is pursued through assurances that address equal access to all occupational programs, provisions for supporting supplemental services to assure the success of each special populations group, and an assessment strategy to monitor the success of each special population, thus the success of the state strategy.

Special populations will be provided equal access to activities assisted under this title through guidelines written for use of Perkins funds. Required signed assurances and descriptions of how members of special populations will be provided equal access to CTE programs and services assisted under Title I and II of the Perkins Act will be documented locally. This is evidenced in the submission of the local plan by the secondary and postsecondary entities. Routine on–site reviews to secondary and postsecondary entities will examine documentation relative to participation of special populations. Department of Education staff will investigate thoroughly and promptly any written complaints.

B. WILL NOT BE DISCRIMINATED AGAINST ON THE BASIS OF THEIR STATUS AS MEMBERS OF SPECIAL POPULATIONS; AND

Secondary and Postsecondary Strategies Special populations will not be discriminated against based on their status as members of the special populations through appropriate requirements of civil rights legislation incorporated into program assurances. Initial reviews of secondary and postsecondary recipients' applications, on–site reviews investigation of complaints will insure that discrimination does not occur on the basis of status as a member of a special population.

C. WILL BE PROVIDED WITH PROGRAMS DESIGNED TO ENABLE THE SPECIAL POPULATIONS TO MEET OR EXCEED STATE ADJUSTED LEVELS OF PERFORMANCE, AND HOW YOU WILL PREPARE SPECIAL POPULATIONS FOR FURTHER LEARNING AND FOR HIGH-SKILL, HIGH-WAGE, OR HIGH-DEMAND OCCUPATIONS. (SECTION 122(C)(9)(A)-(C))

Secondary and Postsecondary Strategies Special populations will be provided with services designed to enable them to meet or exceed state–adjusted levels of performance. Programs will prepare special populations for further learning and for high–skill, high–wage careers. The local plan design requires the evaluation of each CTE program and the success of each special population group on adjusted levels of performance. Guidelines further require the use of funds for programs and activities where performance is below adjusted state standards.

The Bureau of Career and Technical Education will annually utilize a Special Populations Needs Assessment for incorporation into local plan applications via the eGrant, fulfilling the requirements of Section 124(b) 1; a series of questions from the legislation relating to what the needs of the special populations students are from each funded LEA and how each LEA plans to address these assessed needs.

Special populations will participate in career guidance and academic counseling programs designed to promote improved career and education decision making skills regarding postsecondary education and training options in preparation for high–skill, high–wage or high–demand occupations and nontraditional fields.

2. YOU MUST DESCRIBE HOW YOU WILL ADEQUATELY ADDRESS THE NEEDS OF STUDENTS IN ALTERNATIVE EDUCATION PROGRAMS, IF YOU HAVE SUCH PROGRAMS. (SECTION 122(C)(14))

Pennsylvania regulations established Alternative Education programs for disruptive youth. The programs are implemented by a school district, an area career and technical education school, a group of school districts or an intermediate unit, which removes disruptive students from regular school programs in order to provide those students with a sound educational course of study and counseling designed to modify disruptive behavior and return the students to a regular school curriculum. Notwithstanding Section 1502, Alternative Education Programs may operate outside the normal school day of the applicant district, including Saturdays. School districts shall adopt a policy for periodic review of students placed in the Alternative Education program for disruptive students. This review shall occur, at a minimum, at the end of every semester the student is in the program or more frequently at the district's discretion. The purpose of this review is to determine whether or not the student is ready to return to the regular school curriculum. Programs may include services for students returning from placements or who are on probation resulting from being adjudicated

delinquents in a proceeding under 42 PA C.S. Ch. 63 (relating to juvenile matters) or who have been judged to have committed a crime under an adult criminal proceeding. These programs address the academic, social and emotional needs of youth.

3. DESCRIBE HOW FUNDS WILL BE USED TO PROMOTE PREPARATION FOR HIGH-SKILL, HIGH-WAGE, OR HIGH-DEMAND OCCUPATIONS AND NON-TRADITIONAL FIELDS. (SECTION 122(C)(18))

Secondary and Postsecondary Strategies All newly submitted programs must meet the criteria developed by the Pennsylvania Department of Labor and Industry (L&I). The Department of Labor and Industry has developed a CIP/SOC crosswalk that identifies which “High Priority Occupations” are aligned to each CIP program. The Department of Labor and Industry develops a career guide and other resources that can be used as instructional materials. The materials can be used with all students beginning at the middle school. The materials show students how to choose a career and how choosing a career and the education path is linked to Career and Technical Education. The recently adopted statewide academic standards of Career Education and Work require all school districts to develop education and career plans for all students beginning with Grade K. PDE has also developed resources that can be used by school districts and career and technical education centers. The materials not only evidence high–priority occupations but also provide information on nontraditional fields and connection to postsecondary opportunities. All postsecondary institutions participating in Perkins must establish a working relationship with the local WIBs and PA CareerLink Centers to ensure that postsecondary Perkins local occupational advisory committees are addressing current state, regional and local labor market needs in high–priority, high–skill, high–wage and high–demand occupations. To improve nontraditional participation and completion, PDE/BCTE is identifying state non–traditional occupations by CIP and aligning with NAPE’s national listing of nontraditional occupations by industry cluster. All funded secondary and postsecondary programs are required to maintain assurance folders on nontraditional program efforts and overall improvement of nontraditional performance measures.

4. YOU MUST DESCRIBE HOW FUNDS WILL BE USED TO SERVE INDIVIDUALS IN STATE CORRECTIONAL INSTITUTIONS. (SECTION 122(C)(19))

The Pennsylvania Department of Corrections Inmate profile reveals the following characteristics: (A) the average inmate is functioning on a 7.5 grade level in reading and a 6.7 grade level in math, (B) almost 46 percent of the inmates lack a high school diploma and 32 percent have not completed the 9th grade, (C) 75 percent claim they have little or no vocational skills and over 80 percent were unemployed upon arrest and (D) 85 percent report that they need some type of drug/alcohol treatment. The average inmate spends approximately 49 months incarcerated and there are approximately 42,000 inmates in the system, thus a significant need for educational programs. The Commonwealth of Pennsylvania provides an education/training appropriation in which full–time academic, vocational and counseling staffs are hired. The funds received from this grant ($431,453) provide five institutions with supplemental vocational funding, specifically, the salary and benefits for five vocational instructors.

5. YOU MUST DESCRIBE HOW YOU WILL REQUIRE EACH APPLICANT FOR FUNDS TO INCLUDE IN ITS APPLICATION A DESCRIPTION OF THE STEPS THE APPLICANT PROPOSES TO TAKE TO ENSURE EQUITABLE ACCESS TO, AND PARTICIPATION IN, ITS FEDERALLY-ASSISTED PROGRAM FOR STUDENTS, TEACHERS, AND OTHER PROGRAM BENEFICIARIES WITH SPECIAL NEEDS AS

CONTAINED IN SECTION 427(B) OF THE GENERAL EDUCATION PROVISIONS ACT AS AMENDED. FOR FURTHER GUIDANCE AND EXAMPLES, SEE THE NOTICE TO ALL APPLICANTS AT HTTP://WWW.ED.GOV/FUND/GRAN/APPLY/APPFORMS/GEPA427.DOC

Secondary and Postsecondary Strategies PDE requires all eligible recipients to submit a proposal that outlines the actions and use of funds the recipient will follow. The grant application is reviewed by regionally assigned staff members whose responsibility is to ensure Perkins IV funds are used as required. The review of the grants ensures that the eligible recipients will meet the requirements of 427(b). Inclusion of all special population's sub–groups is monitored during the local plan application process, on–site reviews and annual reporting of disaggregated data for federal CAR reporting.

IV. ACCOUNTABILITY AND EVALUATION

In addition to the narrative information provided below, you must submit your measurement definitions (Items 3 and 11 below) and proposed performance levels (Items 5 and 11 below) for the upcoming program year using the link to the Perkins State Plan Portal below.

A. STATUTORY REQUIREMENTS

1. YOU MUST DESCRIBE PROCEDURES YOU WILL USE TO OBTAIN INPUT FROM ELIGIBLE RECIPIENTS IN ESTABLISHING MEASUREMENT DEFINITIONS AND APPROACHES FOR THE CORE INDICATORS OF PERFORMANCE FOR CAREER AND TECHNICAL EDUCATION STUDENTS AT THE SECONDARY AND POSTSECONDARY LEVELS, AS WELL AS FOR ANY OTHER ADDITIONAL INDICATORS OF PERFORMANCE IDENTIFIED BY THE ELIGIBLE AGENCY. (SECTION. 113(B)(1)(A)-(B), SEC. 113(B)(2)(A)-(C))

Accountability is a foundation of the Commonwealth's emerging workforce development system. Programs and providers will be measured on the results they achieve as a return on investment of public funds. The state accountability system will ensure quality performance, as well as be compatibility with the seamless delivery system of the Pennsylvania Performance Management System. This system collects and examines workforce development efforts supported by state and federal funds.

The Carl D. Perkins Career and Technical Education Improvement Act of 2006 identified core performance indicators to be measured as part of the education improvement efforts. Pennsylvania will incorporate the core indicators of performance into its accountability system. Pennsylvania Department of Education sought input into the Perkins accountability system and the five year state plan from representatives of the eligible recipients. A task force was formed. The purpose of the task force was to assist in outlining actions for the State to pursue and to assist in developing the core indicators of performance.

The steps that the Pennsylvania Department of Education, Bureau of Career and Technical Education, took to involve representatives of eligible recipients in the development of core indicators of performance and the state adjusted levels of performance are as follows:

(a) An email and phone calls inviting input from eligible recipients to develop core indicators and the state adjusted levels of performance. The eligible recipients acknowledging an interest in participating formed a Task Force.

(b) Seven face-to-face consultation meetings were held with representatives from the Pennsylvania Vocational Administrators of Pennsylvania, Bucks County Community College, Community College of Allegheny County, Lackawanna College, Luzerne County Community College, the Penn State University System, Lehigh Career and Technical Institute and Cumberland Perry Technical School.

(c) The five year state plan will be presented to the State Board of Vocational Education for approval prior to April 1, 2008 submission deadline. Final comment was gathered during regional statewide public hearings held in December 2007.

2. YOU MUST DESCRIBE THE PROCEDURES YOU WILL USE TO OBTAIN INPUT FROM ELIGIBLE RECIPIENTS IN ESTABLISHING A STATE ADJUSTED LEVEL OF PERFORMANCE FOR EACH OF THE CORE INDICATORS OF PERFORMANCE FOR CAREER AND TECHNICAL EDUCATION STUDENTS AT THE SECONDARY AND POSTSECONDARY LEVELS, AS WELL AS STATE LEVELS OF PERFORMANCE FOR ANY ADDITIONAL INDICATORS OF PERFORMANCE IDENTIFIED BY THE ELIGIBLE AGENCY. (SECTION 122(C)(10)(A), SEC. 113(B)(3)(B))

An advisory committee was convened, consisting of representatives from all stakeholder groups required under Perkins IV including: high schools, adult programs, postsecondary institutions, members of special populations, charter school organizers, parents and students, labor organizations, counselors and members from business and industry including a state WIB member. The initial state adjusted performance levels have been decided upon by USDOE for those indicators whose definitions have not changed. The initial state adjusted performance levels are based on most recent available data. The advisory committee supports the process and the use of appropriate existing performance measures used in the previously submitted FAUPL.

The state will only establish baselines on those measures for which data is available (1S1, 1S2, 2S1, 5S1, 6S1, 6S2, 1P1 4P1, 5P1 and 5P2). For the new indicators we are establishing baselines during the transition year (3S1 and 2P1).

In regards to graduation rate–4S1*, multi year identification of CTE students will begin in 2007–2008 utilizing PDE‘s unified data collection system which uses a unique student identifier, entitled Pennsylvania Information Management System, (PIMS) to establish graduation rates by the 2012 school year. PDE is still ascertaining a valid collection vehicle to obtain 4S1 data.

Student Retention and Transfer (3P1)**: PDE is exploring a working relationship with the National Student Data Clearing House to report 3P1 on the 2008–2009 CAR.

The State established Annual Measurable Outcomes (AMO) for Math, Reading and Graduation Rates based on state established targets. The Skill Attainment, at Competent and Advanced (2S1), baseline has been calculated based on the most recent past performance.

3. IDENTIFY, ON THE FORMS IN PART C OF THIS GUIDE, THE VALID AND RELIABLE MEASUREMENT DEFINITIONS

You must identify, on the forms in Part C of this guide, the valid and reliable measurement definitions and approaches that you will use for each of the core indicators of performance for career and technical education students at the secondary and postsecondary/adult levels, as well as any additional indicators of performance identified by the eligible agency, that are valid and reliable. You must describe how your proposed definitions and measures are valid and reliable. (Section 113(b)(2)(A)-(B)) Section 113(b) of the Act describes the measures that a State must use for student attainment of challenging academic content standards and student academic achievement standards in reading/language arts and mathematics (1S1 and 1S2, respectively) and student graduation rates (4S1). Based on our non-regulatory guidance, we have prepopulated the measurement definitions on the Final Agreed Upon Performance Levels (FAUPL) form for your convenience. You do not need to describe how these definitions and measures are valid and reliable in your State plan narrative. A State that chooses to propose other student definitions and measurement approaches in its new State plan would have to describe how its proposed definitions and measures would be valid and reliable. (The Secretary is considering whether to issue regulations requiring a State to agree to use the student definitions and measurement approaches for the core indicators of performance for academic attainment in reading/language arts and mathematics and graduation rates as contained in the guidance document. If the Secretary decides to regulate on these issues and adopts final rules, a State may be required to amend its State plan.

4. YOU MUST DESCRIBE HOW, IN THE COURSE OF DEVELOPING CORE INDICATORS OF PERFORMANCE AND ADDITIONAL INDICATORS OF PERFORMANCE, YOU WILL ALIGN THE INDICATORS, TO THE GREATEST EXTENT POSSIBLE, SO THAT INFORMATION SUBSTANTIALLY SIMILAR TO THAT GATHERED FOR OTHER STATE AND FEDERAL PROGRAMS, OR FOR ANY OTHER PURPOSE, IS USED TO MEET THE ACT'S ACCOUNTABILITY REQUIREMENTS. (SECTION 113(B)(2)(F))

The measures that we are using are part of the Pennsylvania State System of Academic assessment. The measures 1S1, 1S2 have undergone extensive research and development and annual review by test publishers and third party to ensure maximum validity and reliability. We adhere to the Standards for Educational and Psychological Measurement.

Graduation rate 4S1 has been calculated using procedures defined in the Pennsylvania Accountability Workbook (which has received USDOE approval).

Section 113(b) of the Act describes the measures that a State must use for student attainment of challenging academic content standards and student academic achievement standards in reading/language arts and mathematics (1S1 and 1S2, respectively) and student graduation rates (4S1). Based on our non–regulatory guidance, we have prepopulated the measurement definitions on the Final Agreed Upon Performance Levels (FAUPL) form for your convenience. You do not need to describe how these definitions and measures are valid and reliable in your State plan narrative. A State that chooses to propose other student definitions and measurement approaches in its new State plan would have to describe how its proposed definitions and measures would be valid and reliable. (The Secretary is considering whether to issue regulations requiring a State to agree to use the student definitions and measurement approaches for the core indicators of performance for academic attainment in reading/language arts and mathematics and graduation rates as contained

in the guidance document. If the Secretary decides to regulate on these issues and adopts final rules, a State may be required to amend its State plan.

The performance measures used to meet the Act's accountability requirements are the same performance measures used in monitoring and evaluating career and technical education programs. The state provides funds to support career and technical education programs and effectiveness of the programs is determined by reviewing the data associated with performance measures for the core indicators established for this Act. This data is the same data that is reported for the state's performance management system that examines workforce development systems across agencies.

5. PROVIDE, FOR THE FIRST TWO YEARS COVERED BY THE STATE PLAN, PERFORMANCE LEVELS

You must provide, for the first two years covered by the State plan, performance levels for each of the core indicators of performance, except that States submitting one-year transition plans are only required to submit performance levels for part of the indicators as discussed above. For performance levels that are required, the States' performance levels, at a minimum, must be expressed in a percentage or numerical form, so as to be objective, quantifiable, and measurable; and require the State to continually make progress toward improving the performance of career and technical education students. (Section 113(b)(3)(A)(i)-(II)) Section 113(b)(2) of the Perkins Act requires a State to develop valid and reliable core indicators of performance, to propose performance levels in its State plan, and to reach agreement with the Department on "adjusted performance levels" for each of the core indicators. In so doing, the Perkins Act prescribes the measures that a State must use for some of the core indicators.

A. PERKINS ACT REQUIRES A STATE TO MEASURE CAREER AND TECHNICAL EDUCATION

(a) Section 113(b)(2)(A)(i) of the Perkins Act requires a State to measure career and technical education students' attainment of "challenging academic content standards" and "student academic achievement standards" that a State adopted pursuant to section 1111(b)(1) of the ESEA. The Perkins Act further requires a State use its State's academic assessments (i.e. the State's reading/language arts and mathematics tests) implemented under section 1111(b)(3) of the ESEA to measure career and technical education students' attainment of these State standards. Thus, a State's core indicators must include career and technical education students' proficiency in reading/language arts and mathematics as measured under 1111(b)(1) and (3) of the ESEA. Accordingly, under the Perkins Act, a State must report the number or percent of its career and technical education students who score at the proficient level or above on the State's assessments in reading/language arts and mathematics administered under the ESEA to measure the academic proficiency of secondary career and technical education students against the ESEA standards. To measure attainment of these standards, a State must develop and reach agreement with the Department on "adjusted performance levels," which constitute the State's performance targets for a program year. Permissible targets (i.e. "adjusted performance levels") would be a State's "annual measurable objectives" (AMOs) from its State's ESEA accountability workbook. (To ensure that a State's schools are making "adequate yearly progress" (AYP) as required under section 1111(b)(2)(A) of the ESEA, section 1111(b)(2)(G) of the ESEA requires a State to establish Statewide AMOs, which identify a single minimum percentage of students who are required to meet or exceed the proficient level on the State's academic assessments each year.) Under the Perkins Act, a State may propose different performance levels (targets) instead of its AMOs as discussed below.

B. STATE TO IDENTIFY A CORE INDICATOR TO MEASURE FOR ITS CAREER AND TECHNICAL EDUCATION

Section 113(b)(2)(A)(iv) of the Perkins Act requires a State to identify a core indicator to measure for its career and technical education students at the secondary level "student graduation rates (as described in section 1111 (b)(2)(C)(vi) of the (ESEA))." Thus, a State must report the number or percent of its career and technical education students whom the State includes as graduated in its graduation rate described under the ESEA. To ensure that a State's schools are making AYP as required under section 1111(b)(2)(A) of the ESEA, some States have established Statewide targets for graduation rates under section 1111(b)(2)(C)(vi), and others States have defined AYP only to require improvement in the graduation rate each year. The Department strongly encourages your State to reach agreement on "adjusted performance levels" required under section 113 of the Perkins Act for the core indicators discussed in (a) and (b) above that are the same as your State's AMOs or targets that your State adopted to ensure that your State's schools are making AYP as required under section 1111(b)(2) of the ESEA. However, as noted above, your State may not have established targets for graduations rates under the ESEA, or your State may wish to propose performance levels for these core indicators that are different from your State's targets. If so, your State must provide baseline data using your State's most recent year's achievement data or graduation rate under the ESEA, propose performance levels, and reach agreement with the Department on "adjusted performance levels." (The Secretary is considering whether to issue regulations requiring a State to agree to "adjusted performance levels" under the Perkins Act that are the same as the State's AMOs or targets for graduation rate under the ESEA. If the Secretary decides to regulate on this issue and adopts final rules, a State may be required to amend its State plan.

6. YOU MUST DESCRIBE YOUR PROCESS FOR REACHING AGREEMENT ON LOCAL ADJUSTED LEVELS OF PERFORMANCE IF AN ELIGIBLE RECIPIENT DOES NOT ACCEPT THE STATE ADJUSTED LEVELS OF PERFORMANCE UNDER SECTION 113(B)(3) OF THE ACT AND ENSURING THAT THE ESTABLISHED PERFORMANCE LEVELS WILL REQUIRE THE ELIGIBLE RECIPIENT TO CONTINUALLY MAKE PROGRESS TOWARD IMPROVING THE PERFORMANCE OF CAREER AND TECHNICAL EDUCATION STUDENTS. (SECTION 113(B)(4)(A)(II); SEC. 122(C)(10)(B))

Pennsylvania has provided performance levels for the Five Year Plan FAUPL. At the conclusion of the transition year, after baseline data is collected for updated definitions, PA will request to update FAUPL. (a) Section 113(b)(2)(A)(i) of the Perkins Act requires a State to measure career and technical education students' attainment of "challenging academic content standards" and "student academic achievement standards" that a State adopted pursuant to Section 1111(b)(1) of the ESEA. The Perkins Act further requires a State use its State's academic assessments (i.e., the State's reading/language arts and mathematics tests) implemented under Section 1111(b)(3) of the ESEA to measure career and technical education students' attainment of these State standards. Thus, a State's core indicators must include career and technical education students' proficiency in reading/language arts and mathematics as measured under 1111(b)(1) and (3) of the ESEA. Accordingly, under the Perkins Act, a State must report the number or percent of its career and technical education students who score at the proficient level or above on the State's assessments in reading/language arts and mathematics administered under the ESEA to measure the academic proficiency of secondary career and technical education students against the ESEA standards.

(b) Section 113(b)(2)(A)(iv) of the Perkins Act requires a State to identify a core indicator to measure for its career and technical education students at the secondary level “student graduation rates (as described in Section 1111 (b)(2)(C)(vi) of the [ESEA]).” Thus, a State must report the number or percent of its career and technical education students whom the State includes as graduated in its graduation rate described under the ESEA. To ensure that a State’s schools are making AYP as required under Section 1111(b)(2)(A) of the ESEA, some States have established Statewide targets for graduation rates under Section 1111(b)(2)(C)(vi) and others States have defined AYP only to require improvement in the graduation rate each year.

For three of these indicators (1S1, 1S2 and 4S1*) the performance levels are already established under NCLB.

Student Graduation Rates (4S1)* – Individual student data collection will begin with the 2007–2008 school year, high school graduation rates will not be available using PASecureID information until February 2012 for the Class of 2011. By definition, graduates include students that graduated over the summer following the usual June graduation and dropouts are not determined until October 1 for the preceding 12–month period. Therefore, the potential exists to track occupational career/technical center student graduation rates starting with the Class of 2011.

The negotiations for 2S1, 3S1, 5S1, 6S1, 6S2, 1P1, 2P1,, 4P1, 5P1, 5P2 will be based on each recipient’s previous performance which will establish their baseline. The baseline will be the most recent data when available.

The following response refers to the indicators not associated with NCLB. Pennsylvania is expected to conduct negotiations with local eligible recipients on levels of performance for five of the eight secondary indicators (2S1, 3S1, 5S1, 6S1, 6S2) and all 6 postsecondary indicators (1P1, 2P1, 3P1**, 4P1, 5P1, 5P2.

When presented with an established baseline, the eligible recipient will be given an opportunity to demonstrate continuous yearly improvement. All eligible recipients must maintain continuous improvement over the previous year’s performance in all performance measures.

7. YOU MUST DESCRIBE THE OBJECTIVE CRITERIA AND METHODS YOU WILL USE TO ALLOW AN ELIGIBLE RECIPIENT TO REQUEST REVISIONS TO ITS LOCAL ADJUSTED LEVELS OF PERFORMANCE IF UNANTICIPATED CIRCUMSTANCES ARISE WITH RESPECT TO AN ELIGIBLE RECIPIENT. (SECTION 113(B)(4)(A)(VI))

Reviews and revisions of local adjusted performance levels will be made when the circumstances clearly prevent the eligible recipient from meeting the levels. Requests must be accompanied by a recovery plan containing a realistic timeline. During the transition year, objective criteria and methods were developed.

8. YOU MUST DESCRIBE HOW YOU WILL REPORT DATA RELATING TO STUDENTS PARTICIPATING IN CAREER AND TECHNICAL EDUCATION PROGRAMS IN ORDER TO ADEQUATELY MEASURE THE PROGRESS OF THE STUDENTS, INCLUDING SPECIAL POPULATIONS AND STUDENTS PARTICIPATING IN TECH PREP PROGRAMS, IF APPLICABLE, AND HOW YOU WILL ENSURE THAT THE DATA REPORTED TO YOU FROM LOCAL EDUCATIONAL AGENCIES AND ELIGIBLE INSTITUTIONS, AND THE DATA THAT YOU REPORT TO THE

SECRETARY, ARE COMPLETE, ACCURATE, AND RELIABLE. (SECTION 122(C)(13); SECTION 205).

To insure that accurate data is reported to PDE, general data reporting workshops are provided for local education agencies throughout the state. Technical assistance is provided on a one–to–one basis as requested. This includes visits to schools when necessary. In addition, Perkins on–site monitoring includes a review of data and local reporting procedures. Postsecondary data is reviewed at two levels first through the Division of Data Services and second through the Bureau of Career and Technical Education. Data is not accepted until both levels are satisfied.

All student data reports are subjected to extensive edits, both computerized and manual, at the state level. PDE is in the process of implementing a unified data collection system entitled the Pennsylvania Information Management System (PIMS) to collect all required data for federal reporting.

For each group of indicators, a review is made by using the Data Quality Manual. There is a series of questions on the checklist requiring a yes/no and a commentary with the initials of the reviewer. For all measures, common items include a comparison of current and previous year data for consistency and inclusion of all categories (gender, ethnicity, special populations, tech prep). The reviewers also follow the rules of CAR data quality used by the OVAE. For those data from third party and administrative records, it is required that they contain the data initiator and a supervisory sign–off.

9. YOU MUST DESCRIBE HOW YOUR STATE PLANS TO ENTER INTO AN AGREEMENT WITH EACH CONSORTIUM RECEIVING A GRANT UNDER PERKINS IV TO MEET A MINIMUM LEVEL OF PERFORMANCE FOR EACH OF THE PERFORMANCE INDICATORS DESCRIBED IN SECTION 113(B) AND 203(E). (SECTION 204(E)(1))

Local negotiations have been developed and conducted for the first two years and submitted via the annual eGrant application. This process will be used per Perkins IV requirements during the third and fifth year. During the negotiations period, years three and five, each consortium will be given its respective trend data that will determine its baseline. If this baseline is equal to or greater than the state’s Final Agreed Upon Level, the consortium’s proposed performance level will be the same as the state FAUPL. If the consortium’s baseline is below the state baseline, the initial proposed level will be the number halfway between the states and the consortiums. PDE will also accept any modest increase over the consortium’s baseline.

10. YOU MUST DESCRIBE HOW YOU WILL ANNUALLY EVALUATE THE EFFECTIVENESS OF CAREER AND TECHNICAL EDUCATION PROGRAMS, AND DESCRIBE, TO THE EXTENT PRACTICABLE, HOW YOU ARE COORDINATING THOSE PROGRAMS WITH OTHER FEDERAL PROGRAMS TO ENSURE NONDUPLICATION. (SECTION 122(C)(8))

Pennsylvania’s performance management system is created on the premise of continuous improvement. Continuous improvement is a cyclical, never ending process of planning, implementing, evaluating and improving services.

Simply measuring performance alone does not guarantee service/program improvement. The institutional framework of Pennsylvania's workforce strategy is based upon the Malcolm Baldridge seven principles of quality management with a focus on continuous improvement.

WIA offered the opportunity for significant change and unprecedented cooperation between the public and private sectors in supporting Pennsylvania's economic and workforce development needs. Successful implementation of the WIA in Pennsylvania required a constant focus on the employer and job seeker to effectively integrate economic and workforce development at the local, regional and state levels.

Pursuant to Section 113 of the Carl D. Perkins Career and Technical Education Improvement Act of 2006, the Department of Education, Bureau of Career and Technical Education, has developed and implemented a state performance accountability system based on measures and standards approved by the State Board of Education designed to evaluate annually the effectiveness of approved career and technical education programs at the secondary and postsecondary levels. The Perkins requirement to establish a State Performance Accountability system includes the use of evaluation methods containing both process and product.

Each secondary and postsecondary eligible recipient is evaluated annually to determine the effectiveness of all approved career and technical education programs; and provide information on how to maximize the return of investment of state and federal funds in career and technical education activities.

To implement the Five Year Plan beginning July 1, 2008, local entities will be required to submit a five year local plan application via PDE's eGrant system and will include the following: required uses of funds with yearly budget updates; annual amendments to PPC designated Action Plans; a detailed set of descriptions and assurances for the local application covering all aspects of the local program. Attention must be given to the scope of the local program and local accountability issues. The annual evaluation will be based on the state performance measures and standards described above, developed with input from the eligible recipients and approved by the State Board of Education, as prescribed in the Carl D. Perkins Career and Technical Education Improvement Act of 2006.

The design of the State Performance Accountability System has been guided by input from the eligible recipients. In addition, the design addresses the Joint Committee on Standards for Educational Evaluation – 1994 Program Evaluation Standards. These standards were established to provide guidance to effective evaluation. The Joint Committee believes the standards will lead to useful, feasible, ethical and sound program evaluations and that these evaluations will, in turn, contribute significantly to the betterment of education and training in diverse settings. (1994, p. XVIII)

The standards provide a guide for evaluating educational and training programs, projects and materials in a variety of settings. They are intended both for users of evaluations and for evaluators. (1994, p. 1)

The standards are organized around the four important attributes of an evaluation: utility, feasibility, propriety and accuracy. The Joint Committee believes that these four attributes are necessary and sufficient for sound and fair evaluation. (1994, p. 5)

The four attributes are defined as follows:

Utility: These standards guide evaluations so that they will be informative, timely and influential. The seven standards included in this category are Stakeholder Identification, Evaluator, Credibility, Information Scope and Selection, Values Identification, Report Clarity, Report Timeliness and Dissemination and Evaluation Impact.

Feasibility: These standards recognize that evaluations usually are conducted in a natural, as opposed to a laboratory, setting and consume valuable resources. The three standards in the category are Practical Procedures, Political Viability and Cost Effectiveness; moreover, they require the evaluation to be realistic, prudent, diplomatic and economical.

Propriety: These standards reflect the fact that evaluations affect many people in a variety of ways. They are intended to facilitate protecting the rights of individuals affected by an evaluation. The eight standards for propriety are: Service Orientation, Formal Agreement, Rights of Human Subjects, Human Interactions, Complete and Fair Assessment, Disclosure of Findings, Conflict of Interest and Fiscal Responsibility.

Accuracy: These standards determine whether an evaluation has produced sound information, that is. the information must be technically adequate and the judgments rendered must be linked logically to the data. The twelve standards are: Program Documentation, Context Analysis, Described Purposes and Procedures, Defensible Information Sources, Valid Information, Reliable Information, Systematic Information, Analysis of Quantitative Information, Analysis of Qualitative Information, Justified Conclusions, Impartial Reporting and Meta–evaluation.

STATES SUBMITTING ONE-YEAR TRANSITION PLANS

Except as noted above with respect the States submitting one-year transition plans, you must provide all the information requested on the forms provided in Part C of this guide to report accountability data annually to the Secretary under section 113(c)(1)-(2), including:

A. THE STUDENT DEFINITIONS THAT YOU WILL USE FOR THE SECONDARY CORE INDICATORS OF PERFORMANCE AND THE POSTSECONDARY/ADULT CORE INDICATORS OF PERFORMANCE;

B. BASELINE DATA FOR THE CORE INDICATORS OF PERFORMANCE UNDER SECTION 113(B)(2) USING DATA FROM THE MOST-RECENTLY COMPLETED PROGRAM YEAR, EXCEPT THAT, FOR THE INDICATORS FOR WHICH YOUR STATE MUST USE YOUR STATE'S STANDARDS, ASSESSMENT, AND GRADUATION RATES ADOPTED UNDER TITLE I OF THE ESEA, IF YOUR STATE CHOOSES TO USE ITS AMOS AND TARGETS UNDER THE ESEA, YOU WILL NOT NEED TO SUBMIT BASELINE DATA; AND

C. PROPOSED PERFORMANCE LEVELS AS DISCUSSED ABOVE, EXCEPT THAT, FOR THE INDICATORS FOR WHICH YOUR STATE MUST YOUR STATE'S STANDARDS, ASSESSMENTS, AND GRADUATION RATES ADOPTED UNDER TITLE I OF THE ESEA, IF YOUR STATE CHOOSES TO USE ITS AMOS AND TARGETS UNDER THE ESEA, YOU WILL ONLY HAVE TO CONFIRM THIS INFORMATION WITH YOUR OCTAE REGIONAL ACCOUNTABILITY SPECIALIST. UPON YOUR REQUEST, THE REGIONAL ACCOUNTABILITY SPECIALIST WILL PRE-POPULATE THE FORMS

IN PART C WITH YOUR STATE'S AMOS AND TARGETS FOR THE 2007-08 AND 2008-09 PROGRAM YEARS AND SEND THE FORMS FOR YOU TO FINISH COMPLETING.

2. YOU MUST IDENTIFY THE PROGRAM AREAS FOR WHICH THE STATE HAS TECHNICAL SKILL ASSESSMENTS, THE ESTIMATED PERCENTAGE OF CTE STUDENTS WHO TAKE TECHNICAL SKILL ASSESSMENTS, AND THE STATE'S PLAN FOR INCREASING THE COVERAGE OF PROGRAMS AND STUDENTS REPORTED IN FUTURE PROGRAM YEARS.

The definitions are included on the form provided in Part C.

Data for the required core indicators are provided in Part C. The baseline data that is required of states submitting a transition plan are provided. The state is using the AMOs for those indicators measuring academic performance and graduation rate. All other indicators evidence a performance level developed as described above. These are located on the form provided in Part C. BCTE is in the process of aligning approved program areas to an industry based third party national assessment. Barring unforeseen circumstances, it is expected that 86 percent of CTE concentrators will be the minimum participation rate for all concentrators who will be tested for job readiness in general or industry credentials in particular.

BCTE is continually seeking to add to the list of approved tests for use in assessing student skill attainment. We annually invite industry representatives and test developers to present their assessments for review. The evaluations will be conducted on the basis of the criterion checklist which includes data availability, test security and validity. To date BCTE has recognized three test developers. During the Perkins IV authorization, as program of studies are developed, related assessments will be identified or developed on the basis of industry standards alignment.

V. TECH PREP PROGRAMS

As noted above, Congress eliminated a separate allocation for Title II, Tech Prep under Perkins IV in the 2011 Continuing Resolution. States are not required to provide or revise this Section V, Tech Prep Programs, unless your State chooses to do so.

A. STATUTORY REQUIREMENTS

1. DESCRIBE THE COMPETITIVE BASIS OR FORMULA YOU WILL USE TO AWARD GRANTS TO TECH-PREP CONSORTIA. (SECTION 203(A)(1))

The application submitted for all consortiums must contain a plan for the development and implementation of "Programs of Study" that will be reviewed and endorsed by the local Workforce Investment Board. Beginning in the 2008–2009 the current 16 Tech Prep regional consortia will be realigned. Tech Prep awards will be granted on a competitive basis

PDE will give special consideration to Tech Prep applications that –

• Develop and implement statewide "Programs of Study" by CIP, as recognized by the Pennsylvania Department of Education (PDE). • Establish, as part of that "Program of Study," an approved

statewide articulation agreement that supports the CIP and the Guidelines designed for all PDE approved Career and Technical Education “Programs of Study.” • Facilitate the alignment of academic and technical curriculum between secondary and postsecondary levels that meets industry standards related to an approved “Program of Study.” • Facilitate the alignment of curriculum between secondary and postsecondary levels that meets Pennsylvania academic standards related to the approved “Programs of Study.” • Facilitate the alignment of academic and technical curriculum between secondary and postsecondary levels to eliminate the need for remediation at the postsecondary level. • Assess, plan, develop organize and implement “Program of Study” activities within the state defined regions that prepare graduates for “High Priority Occupations” as identified by the Pennsylvania Department of Labor and Industry. • Maintain communication with all consortium schools that have PDE approved Career and Technical Education “Programs of Study.” • Assist all consortium schools in the identification and reporting of Tech Prep students within PDE approved Career and Technical Education “Programs of Study” within the state defined regions that prepare graduates for “High Priority Occupations” as identified by the Pennsylvania Department of Labor and Industry.

2. YOU MUST DESCRIBE HOW YOU WILL GIVE SPECIAL CONSIDERATION TO APPLICATIONS THAT ADDRESS THE AREAS IDENTIFIED IN SECTION 204(D). (SECTION 204(D)(1)-(6))

BCTE has developed a “Program of Study” template that will require Tech Prep Regions in the state to assist in the development of “Programs of Study” by CIP Code t CIPs will be selected and approved for development by the BCTE and will be based on the program’s potential to lead to high–wage, high–skill and high–demand jobs to include emerging technology, in which there is a significant workforce shortage. These “Programs of Study” will lead to employment opportunities or the transfer of students to baccalaureate or advanced degree programs. The “Programs of Study” will be developed in consultation with business and industry, institutions of higher education and labor organizations to incorporate and align secondary and postsecondary programs. “Programs of Study” will effectively address the issues of school dropout prevention and reentry by aligning “Programs of Study” with Pennsylvania academic standards and employability competencies.

3. YOU MUST DESCRIBE HOW YOU WILL ENSURE AN EQUITABLE DISTRIBUTION OF ASSISTANCE BETWEEN URBAN AND RURAL CONSORTIUM PARTICIPANTS. (SECTION 204(F))

There will be equitable distribution of awards between urban and rural through Pennsylvania’s designated Workforce Investment Regions.

4. YOU MUST DESCRIBE HOW YOUR AGENCY WILL ENSURE THAT EACH FUNDED TECH PREP PROGRAM—

A. Is carried out under an articulation agreement between the participants in the consortium, as defined in section 3(4) of the Act;

B. Consists of a program of study that meets the requirements of section 203(c)(2)(A)-(G);

C. Includes the development of tech prep programs for secondary and postsecondary education that meet the requirements of section 203(c)(3)(A)-(D);

D. Includes in-service professional development for teachers, faculty, and administrators that meets the requirements of section 203(c)(4)(A)-(F).

E. Includes professional development programs for counselors that meet the requirements of section 203(c)(5)(A)-(F);

F. Provides equal access to the full range of technical preparation programs (including pre-apprenticeship programs) to individuals who are members of special populations, including the development of tech-prep program services appropriate to the needs of special populations (Section 203(c)(6));

G. Provides for preparatory services that assist participants in tech-prep programs (Section 203(c)(7)); and

Coordinates with activities under Title I. (Section 203(c)(8))

Every “Program of Study” will operate under a statewide articulation agreement. The required statewide articulation agreements between secondary and postsecondary institutions shall include:

1. Content specified in courses offered by the secondary institution that aligns with course content at the postsecondary institution syllabi and/or competency lists of courses from the institutions involved must be maintained in the appropriate offices. 2. The operational procedures and responsibilities of each party involved in the implementation of the articulation agreement. 3. The student evaluation plan and process including descriptions of required proficiency levels and criteria for measurement. 4. Evaluation plan that includes an annual review and a renewal date not to exceed three years. 5. A description of student admission requirements. 6. Signatures of authorized representatives of participating institutions. 7. On a case–by–case basis, provide options for out–of–county students to articulate without sanction if equivalent articulation elements are satisfied.

“Programs of Study” will be carried out under a statewide articulation agreement between participants in the consortium and combine a minimum of two (2) years of secondary education with a minimum of two(2) years of postsecondary education in a nonduplicative, sequential course of study or an apprenticeship program of not less than two (2) years following secondary education instruction. Instruction will integrate academic and career and technical education instruction and utilize work–based and worksite learning experiences where appropriate and available to build student competency. “Programs of Study” will lead to a career field that is high–skill, high–wage and high–demand. Technical skills and core academic subjects will be attained in a coherent sequence of courses that lead to technical skill proficiency, an industry–recognized credential, a certificate or a degree in a specific career field. The goal is to have each student in a “Program of Study” that leads to placement in high–demand, high–skill or high–wage employment or to further education.

Pennsylvania “Programs of Study” will include coherent and rigorous academic content aligned with Pennsylvania academic standards and relevant career and technical education content integrated in a coordinated, non–duplicative progression of courses that align secondary and postsecondary education to adequately prepare students to succeed in careers. Pennsylvania academic standards link secondary schools and two–year postsecondary institutions, and if possible and practicable, four–year institutions of higher education. These “Programs of Study” will also include the opportunity for secondary education students to earn postsecondary education credits through dual or concurrent enrollment, articulated credit or other ways leading to a Pennsylvania recognized industry–based credential, credit–bearing certificate, associate or baccalaureate degree. If appropriate and available, work–based or worksite learning experiences, in conjunction with

business and all aspects of an industry, will be made available. As appropriate, educational technology and distance learning will involve all the participants in the consortium.

Inservice professional development will include teachers, faculty and administrators to support the effective implementation of “Programs of Study,” to encourage joint training in the Tech Prep regions, to support the needs, expectations and methods of business and all aspects of an industry, to support the use of contextual and applied curricula, instruction and assessment, to support the use and application of technology and to assist in accessing and utilizing data, information available pursuant to Section 118 and information on student achievement, including assessments.

The annual integration conference and specially designed videoconferences and regional workshops will address “Programs of Study.” In addition, the agency will work with PA Association of Career and Technical Education (PACTEC) and the PA Association of Career and Technical Education Administrators (PACTA) to deliver POS training.

In light of the Perkins IV legislation, any professional development programs for school counselors must focus active support in the creation of a middle and high school environment that is student centered, results focused, data informed and personalized. In particular to the State Tech Prep Plan, it is imperative that school counselors assist all students to feel connected to and complete the “Programs of Study,” to promote access and equity for all students and to assist in designing a school counseling program that ensures all students meet high academic standards.

To accomplish these goals of professional development under the State Tech Prep Plan, it is suggested the Bureau contract with outside consultants in conducting five regional training sessions or webinars. Selected regional sites could be: IU 7 (Southwestern), IU 5 (Northwestern), IU 14 (Southeastern), IU 18 (Northeastern), IU 15 (Central Pa). The following suggested topics could guide the day long training session: (1) How to use the new websites of: www.pacareerstandards.com, www.pacareerzone.com and using the Pa Career Guide more effectively within the classroom, (2) Understanding/ Implementing the new Career Education and Work Standards, (3) Understanding and using career software for career research and developing online career plans and career portfolios, (4) Understanding, collecting and using data to drive change.

“Programs of Study” will provide equal access to individuals who are members of Special Populations and include the development of “Programs of Study” services appropriate to the needs of Special Populations. All entities receiving Perkins funds adhere to regulations addressing Special Populations including Individuals with Disabilities Education Act (IDEA), Civil Rights and PA Chapters 11. 14. 4 and 339.

Preparatory services will assist “Program of Study” participants. All entities receiving Perkins funds are required to provide preparatory services.

“Programs of Study” will coordinate with activities conducted under Title I. The agency requires all career and technical education programs to follow the components of “Programs of Study.” All recipients of Perkins IV Title I funds will participate with Tech Prep Consortia to assist in the development of “Programs of Study.” Each entity will also report required data.

5. YOU MUST DESCRIBE HOW YOUR STATE PLANS TO ENTER INTO AN AGREEMENT WITH EACH CONSORTIUM RECEIVING A GRANT UNDER PERKINS IV TO MEET A MINIMUM LEVEL OF PERFORMANCE FOR EACH OF THE

PERFORMANCE INDICATORS DESCRIBED IN SECTIONS 113(B) AND 203(E). (SECTION 204(E)(1))

Each consortium receiving Perkins IV Title II funds enters a contractual agreement. This agreement includes agreeing to meet the required performance indicators. The agency will establish minimum levels of performance for each indicator on the previous year's data. When the performance indicator is a new indicator and previous year's data is not available, the 2007–2008 year will serve as the baseline.

B. OTHER DEPARTMENTAL REQUIREMENTS

1. YOU MUST SUBMIT A COPY OF THE LOCAL APPLICATION FORM(S) USED TO AWARD TECH PREP FUNDS TO CONSORTIA AND A COPY OF THE TECHNICAL REVIEW CRITERIA USED TO SELECT WINNING CONSORTIA, IF FUNDS ARE AWARDED COMPETITIVELY.

VI. FINANCIAL REQUIREMENTS

As noted above, in addition to the narrative information provided below, you must submit an updated budget (Item B.1a below) for the upcoming program year using the link to the Perkins State Plan Portal below.

A. STATUTORY REQUIREMENTS

1. YOU MUST DESCRIBE HOW YOUR AGENCY WILL ALLOCATE FUNDS IT RECEIVES THROUGH THE ALLOTMENT MADE UNDER SECTION 111, INCLUDING ANY FUNDS THAT YOU CHOOSE TO CONSOLIDATE UNDER SECTION 202(A), WILL BE ALLOCATED AMONG CAREER AND TECHNICAL EDUCATION AT THE SECONDARY LEVEL, OR CAREER AND TECHNICAL EDUCATION AT THE POSTSECONDARY AND ADULT LEVEL, OR BOTH, INCLUDING THE RATIONALE FOR SUCH ALLOCATION. (SECTION 122(C)(6)(A); SECTION 202(C))

Funds received under Section 111 for allocations to secondary and postsecondary eligible recipients were divided as follows: 70 percent to secondary recipients, 30 percent to postsecondary recipients. The split was determined by the following criteria:

(a) History of set aside amounts

(b) Number of career and technical enrollees

(c) Number of career and technical programs

(d) Consideration of full–time and part–time enrollment

(e) Consideration of overlap of facilities for programs

(f) Amounts of other state/federal reimbursement

Formulas described in the Act will be utilized for allocation among secondary and postsecondary eligible recipients.

2. YOU MUST PROVIDE THE SPECIFIC DOLLAR ALLOCATIONS MADE AVAILABLE BY THE ELIGIBLE AGENCY FOR CAREER AND TECHNICAL EDUCATION PROGRAMS UNDER SECTIONS 131(A)-(E) AND HOW THESE ALLOCATIONS ARE DISTRIBUTED TO LOCAL EDUCATIONAL AGENCIES, AREA CAREER AND TECHNICAL EDUCATION SCHOOLS, AND EDUCATIONAL SERVICE AGENCIES WITHIN THE STATE. (SECTION 131(G); SECTION202(C))

$28,620,398.00: See Appendix A

All applications are viewed on the Pennsylvania Treasury website.

http://contracts.patreasury.gov/search.aspx

Tentative 2016-2017 Secondary Allocations

2014 Census Data Used

Allocation

AW Beattie Career Center $291,578

Admiral Peary AVTS $119,601

Beaver County AVTS $294,293

Bedford County Technical Center $80,411

Berks CTC $516,184

Bermudian Springs SD $21,769

Bethlehem AVTS $293,720

Bradford Area SD $42,324

Bucks County Technical High Scho $378,200

Butler County AVTS $246,829

Carbon Career & Technical Institute $132,443

Career Institute of Technology $234,899

Carlisle Area SD $66,903

Center for Technical Studies of Mon $291,506

Central PA Institute of Science & Te $93,400

Central Westmoreland CTC $317,753

Chester County IU 24 $763,327

Clarion County Career Center $86,504

Clearfield County CTC $112,270

Columbia-Montour AVTS $155,840

Connellsville Area Career & Techni $100,385

Corry Area SD $48,785

Crawford County AVTS $156,069

CTC of Lackawanna County $414,830

Cumberland-Perry AVTS $422,990

Dauphin County AVTS $562,380

Delaware County AVTS $995,713

Delaware Valley SD $49,523

Eastern Center for Arts & Technolo $262,097

Eastern Westmoreland CTC $94,205

Erie City SD $342,233

Erie County Technical School $294,553

Fayette County AVTS $224,666

Forbes Road CTC $477,413

Franklin County CTC $325,657

Fulton County AVTS $30,463

Gettysburg Area SD $104,787

Greater Altoona CTC $254,365

Greater Johnstown AVTS $108,059

Greater Johnstown SD $90,097

Greene County CTC $76,463

Hazleton Area Career Center $193,007

Huntingdon Co CTC $79,458

Indiana County Technology Center $147,299

Jefferson County-DuBois AVTS $155,233

Jersey Shore Area SD $35,532

Keystone Central CTC $83,691

Lancaster County CTC $832,222

Lancaster SD $190,168

Lawrence County CTC $186,556

Lebanon County CTC $279,786

Lehigh Career & Technical Institute $740,830

Lenape Tech $141,877

Littlestown Area SD $23,344

Lycoming CTC $102,640

McKeesport Area Tech Ctr $100,007

Mercer County Career Center $264,685

Middle Bucks Institute of Technolog $275,013

Mifflin County Academy of Science $160,453

Milton Area SD $35,348

Mon Valley CTC $130,857

Monroe Career & Tech Inst $385,812

North Montco Tech Career Center $319,829

Northern Tier Career Center $142,985

Northern Tioga SD $33,810

Northern Westmoreland CTC $140,071

Northumberland County AVTS $93,745

Parkway West CTC $326,366

Philadelphia City SD $4,976,172

Pittsburgh SD $664,171

Pottstown SD $63,054

Reading-Muhlenberg CTC $575,352

Saint Marys Area SD $26,855

Schuylkill Technology Centers $254,824

Selinsgrove Area SD $21,355

Seneca Highlands IU 9 $89,117

Somerset County Technology Center $123,219

State College Area SD $69,589

Steel Center AVTS $302,556

SUN Area CTC $172,290

Susquehanna County CTC $100,233

Tunkhannock Area SD $25,285

Tussey Mountain SD $26,664

Tyrone Area SD $21,060

Universal Audenreid CHS $377,119

Upper Bucks County AVTS $121,274

Upper Dauphin Area SD $21,651

Venango Technology Center $159,229

Wallenpaupack Area SD $37,895

Warren County AVTS $80,235

Wayne Highlands SD $43,153

Wellsboro Area SD $24,330

West Side AVTS $194,305

Western Area CTC $198,738

Western Center for Technical Studie $126,915

Wilkes-Barre AVTS $352,339

Williamsport Area SD $113,098

York Co School of Technology $753,102

Grand Total:

$25,691,284

Tentative 2016-2017 Perkins Postsecondary/Adult Allocations

Based on 2014-2015 Pells Data

Fiscal Agent

Tentative Allocation

BUCKS COUNTY COMMUNITY COLLEGE

$203,791

BUTLER COUNTY COMMUNITY COLL

$144,426

CENTRAL PA INST-SC/TECH

$110,756

CLARION UNIV/VENANGO CAMPUS

$56,412

COMMUNITY COLL OF ALLEGHENY CO

$1,077,140

COMMUNITY COLLEGE OF BEAVER CO

$215,605

COMMUNITY COLLEGE OF PHILA

$1,575,395

DELAWARE COUNTY COMMUNITY COLL

$605,467

GREATER ALTOONA CTC

$83,584

HARCUMCOLLEGE

$292,101

HARRISBURG AREA COMMUNITY COLL

$1,095,157

JOHNSON TECHNICAL INSTITUTE

$83,879

LACKAWANNA JUNIOR COLLEGE

$281,764

LANCASTER CO CTC

$228,896

LEHIGH CARBON COMMUNITY COLL

$469,606

LENAPE AVTS

$134,089

LUZERNE COUNTY COMMUNITY COLL

$466,652

MANOR COLLEGE

$66,454

MERCYHURST COLLEGE

$142,063

MONTGOMERY COUNTY CC

$622,892

MOUNT ALOYSIUS COLLEGE

$98,942

NORTHAMPTON CO AREA CC/ MAIN

$657,744

ORLEANS TECHNICAL INST/RHWN

$82,403

PEIRCE COLLEGE

$194,635

PENN COLLEGE/PSU AFFILIATE $415,262

PENNSYLVANIA HIGHLANDS COMMUNITY CO $172,484

PENNSYLVANIA INST OF TECH $246,322

READING AREA COMMUNITY COLLEGE $527,790

ROSEDALE TECHNICAL INSTITUTE $157,421

THADDEUS STEVENS COLL OF TECH $124,342

WESTMORELAND COUNTY CC $433,278

WILKES-BARRE AVTS $99,237

State Total:

$11,165,989

3. YOU MUST PROVIDE THE SPECIFIC DOLLAR ALLOCATIONS MADE AVAILABLE BY THE ELIGIBLE AGENCY FOR CAREER AND TECHNICAL EDUCATION PROGRAMS UNDER SECTION 132(A) OF THE ACT AND HOW THESE ALLOCATIONS ARE DISTRIBUTED TO POSTSECONDARY INSTITUTIONS WITHIN THE STATE. (SECTION 122(C)(6)(A); SECTION 202(C))

$12,140,538.00 was made available to postsecondary institutions during the 2007–2008 year. Allocation distribution is based on a percentage derived by dividing the individual number of each institution's student vocational Pell count by the total number of vocational Pell counts for all postsecondary and adult programs. The percentage of vocational Pell per institution is then applied against the total allocation awarded to the state producing a percentage of the total to be allocated to each individual postsecondary and adult program.

Allocation = (Pells/State Sum of Pells) X Allocation amount

4. YOU MUST DESCRIBE HOW YOUR AGENCY WILL ALLOCATE ANY OF THOSE FUNDS AMONG ANY CONSORTIA THAT WILL BE FORMED AMONG SECONDARY SCHOOLS, AND HOW FUNDS WILL BE ALLOCATED AMONG THE MEMBERS OF THE CONSORTIA, INCLUDING THE RATIONALE FOR SUCH ALLOCATION. (SECTION 122(C)(6)(B); SECTION 202(C))

$ 18,697,795.00 was made available to secondary consortia during the 2007–2008 year.

When local consortia fall below the minimum allocation amount of $15,000, the consortia is contacted and notified of the need to join new consortia. All fiscal agents operate under a memorandum of understanding. The distribution of funds in the new consortia is not based on a pro–rata distribution.

Pennsylvania will continue to utilize the current formula to allocate Perkins funds to the local consortia. This has proven to be an objective and equitable means of allocating the funds.

Allocations are calculated based on the following formula: After elimination criteria – Get percentage of individual population 5–17 by dividing individual Population 5–17 by state total of Population 5–17 Get percentage of Poverty 5–17 by dividing individual Poverty 5–17 by state total Poverty 5–17 70% allocation = Poverty percentage from above x (allocation amount x .7) 30% allocation = Individual population percentage from above x (allocation amount x .3) Total allocation = 70% allocation + 30% allocation

Allocations are summed up and enrollments collected via PDE's unified data collection system utilizing a secure ID identifier for each student.

Percentages of total student enrollments for each member of the consortia are collected by dividing each individual member of the consortia against the total number of all enrollments within the consortia to get a final percentage for each school.

Total allocation is then divided by this percentage and allocated to the consortium fiscal agent.

A consortia file is generated from the Division of Data Services, which drives the distribution to the fiscal agent.

5. YOU MUST DESCRIBE HOW YOUR AGENCY WILL ALLOCATE ANY OF THOSE FUNDS AMONG ANY CONSORTIA THAT WILL BE FORMED AMONG POSTSECONDARY INSTITUTIONS, AND HOW FUNDS WILL BE ALLOCATED AMONG THE MEMBERS OF THE CONSORTIA, INCLUDING THE RATIONALE FOR SUCH ALLOCATIONS. (SECTION 122(C)(6)(B); SECTION 202(C))

$ 1,968,794.00 was made available to postsecondary consortia during the 2007–2008 year.

When local consortia fall below the minimum allocation amount of $50,000, the consortia is contacted and notified of the need to join new consortia. All fiscal agents operate under a memorandum of understanding. The distribution of funds in the new consortia is not based on a pro–rata distribution.

Postsecondary consortia that are currently formed will receive the allocations as determined by federal regulation. Any new consortia that form will request and notify PDE of the formation. PDE will adjust the postsecondary allocations and assign a fiscal agent.

A consortia file is generated from the Division of Data Services based on known memberships. This file drives the distribution to the fiscal agent. The rationale for such an allocation is based on the formula for calculating the distribution to the individual schools. The formula is:

As per item 3, the allocation distribution is based on a percentage derived by dividing the individual number of each institution's student vocational Pell count by the total number of vocational Pell counts for all postsecondary programs. The percentage of vocational Pells per institution is then applied against the total allocation awarded to the state producing a percentage of the total to be allocated to each individual postsecondary and adult program.

6. YOU MUST DESCRIBE HOW YOU WILL ADJUST THE DATA USED TO MAKE THE ALLOCATIONS TO REFLECT ANY CHANGE IN SCHOOL DISTRICT BOUNDARIES THAT MAY HAVE OCCURRED SINCE THE POPULATION AND/OR ENROLLMENT DATA WAS COLLECTED, AND INCLUDE LOCAL EDUCATIONAL AGENCIES WITHOUT GEOGRAPHICAL BOUNDARIES, SUCH AS CHARTER SCHOOLS AND SECONDARY SCHOOLS FUNDED BY THE BUREAU OF INDIAN AFFAIRS. (SECTION 131(A)(3))

Changes to the allocation will be based on the use of the most current census data for secondary entities and annual collection of Pell data for postsecondary entities.

7. YOU MUST PROVIDE A DESCRIPTION OF ANY PROPOSED ALTERNATIVE ALLOCATION FORMULA(S) REQUIRING APPROVAL BY THE SECRETARY AS DESCRIBED IN SECTION 131(B) OR 132(B). AT A MINIMUM, YOU MUST PROVIDE AN ALLOCATION RUN FOR ELIGIBLE RECIPIENTS USING THE REQUIRED ELEMENTS OUTLINED IN SECTION 131(A) AND/OR SECTION 132(A)(2), TOGETHER WITH AN ALLOCATION RUN USING THE PROPOSED ALTERNATIVE FORMULA(S). ALSO YOU MUST INCLUDE A DEMONSTRATION THAT THE ALTERNATIVE SECONDARY FORMULA MORE EFFECTIVELY TARGETS FUNDS ON THE BASIS OF POVERTY, AS DESCRIBED IN SECTION 131(B)(1) OF THE ACT; AND/OR, IN THE CASE OF AN ALTERNATIVE POSTSECONDARY FORMULA, A DEMONSTRATION THAT THE FORMULA DESCRIBED IN SECTION 132(A)(2) DOES NOT RESULT IN A DISTRIBUTION OF FUNDS TO ELIGIBLE RECIPIENTS THAT HAVE THE HIGHEST NUMBERS OF ECONOMICALLY DISADVANTAGED INDIVIDUALS AND THAT AN ALTERNATIVE FORMULA WOULD RESULT IN SUCH A DISTRIBUTION.

An alternative allocation formula is not used.

B. OTHER DEPARTMENT REQUIREMENTS

EXCEPT AS NOTED ABOVE WITH RESPECT THE STATES SUBMITTING ONE-YEAR TRANSITION PLANS, YOU MUST PROVIDE ALL THE INFORMATION REQUESTED ON THE FORMS PROVIDED IN PART C OF THIS GUIDE TO REPORT ACCOUNTABILITY DATA ANNUALLY TO THE SECRETARY UNDER SECTION 113(C)(1)-(2), INCLUDING:

1. You must submit a detailed project budget, using the forms provided in Part B of this guide.

2. YOU MUST PROVIDE A LISTING OF ALLOCATIONS MADE TO CONSORTIA (SECONDARY AND POSTSECONDARY) FROM FUNDS AVAILABLE UNDER SECTIONS 112(A) AND (C).

The estimated detailed budget is provided on the form found in Part B. The detailed budget is based on the 2007 allocation amount. The budget will change upon notice of the allocation for 2008.

A listing of allocations made to consortia from funds available under Sections 112 (a) and (c) of the Act is provided in Appendix A.

3. YOU MUST DESCRIBE THE SECONDARY AND POSTSECONDARY FORMULAS USED TO ALLOCATE FUNDS AVAILABLE UNDER SECTION 112(A), AS REQUIRED BY SECTION 131(A) AND 132(A).

The following formulas are used to allocate funds to the postsecondary and secondary local entities:

Postsecondary: Allocation = (Pells/State Sum of Pells) x Allocation amount

Secondary: After elimination criteria – Calculate percentage of individual population ages 5–17 by dividing individual population ages 5–17 by state total of population ages 5–17

Calculate percentage of poverty ages 5–17 by dividing individual poverty ages 5–17 by state total poverty ages 5–17 70% allocation = Poverty percentage from above x (allocation amount x .7) 30% allocation = Individual population percentage from above x (allocation amount x .3) Total allocation = 70% allocation + 30% allocation

Allocations are then summed. Enrollments are collected. Dividing school enrollments by a district total collects percentage of enrollments. Total allocation is divided by this percentage.

4. YOU MUST DESCRIBE THE COMPETITIVE BASIS OR FORMULA TO BE USED TO AWARD RESERVE FUNDS UNDER SECTION 112(C).

At this time, reserve funds will not be established during the administration of the Five Year Plan beginning July 1, 2008 through June 30, 2013.

5. YOU MUST DESCRIBE THE PROCEDURES USED TO RANK AND DETERMINE ELIGIBLE RECIPIENTS SEEKING FUNDING UNDER SECTION 112(C).

This is not applicable.

6. YOU MUST INCLUDE A DESCRIPTION OF THE PROCEDURES USED TO DETERMINE ELIGIBLE RECIPIENTS IN RURAL AND SPARSELY POPULATED AREAS UNDER SECTION 131(C)(2) OR 132(A)(4) OF THE ACT.

Pennsylvania recognizes secondary and postsecondary CTE programs located in rural and sparsely populated areas generating less than the minimum allocation under Sections 131 and 132 of the Act. Pennsylvania, upon request, by a secondary LEA, not meeting the minimum allocation, shall waive the application of Paragraph (1) as required under Section 131(c)(2) in accordance with current state guidelines of providing a program of sufficient size, scope and quality. Pennsylvania may waive the application of Paragraph (3)(A)(i) for postsecondary consortiums.

EDGAR CERTIFICATION TABLE

Please review the EDGAR certifications and assurances below. If your State determines that any updates are necessary, you may submit them, along with your request to extend your State plan, via the link to the Perkins State Plan Portal below.

EDGAR CERTIFICATIONS

1. You must provide a written and signed certification that–

   a. The plan is submitted by the State agency that is eligible to submit the plan. [34 CFR 76.104(a)(1)] [*Note: The term 'eligible agency' means a* ***State board*** *designated or created consistent with State law as the sole State agency responsible for the administration, or the supervision of the administration, of career and technical education in the State. See Sec. 3(12).]*
   b. The State agency has authority under State law to perform the functions of the State under the program. [34 CFR 76.104(a)(2)]
   c. The State legally may carry out each provision of the plan. [34 CFR 76.104(a)(3)]
   d. All provisions of the plan are consistent with State law. [34 CFR 76.104(a)(4)]
   e. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. [34 CFR 76.104(a)(5)] [*Note: If a State wishes for the Department to continue sending the grant award documents directly to the State director, this individual's title needs to be listed on this portion of the assurance.*]
   f. The State officer who submits the plan, specified by title in the certification, has authority to submit the plan. [34 CFR 76.104(a)(6)]
   g. The agency that submits the plan has adopted or otherwise formally approved the plan. [34 CFR 76.104(a)(7)]
   h. The plan is the basis for State operation and administration of the program. [34 CFR 76.104(a)(8)]

OTHER ASSURANCES

1. You must submit a copy of the State plan to the State office responsible for the Intergovernmental Review Process if your State implements that review process under Executive Order 12372. [See 34 CFR Part 79]
2. You must provide a complete and signed ED Form 80-0013 for certifications regarding lobbying; [See 34 CFR Part 82. To download ED Form 80-0013, and the SF LLL Form (Disclosure of Lobbying Activities) referred therein, See: http://www.ed.gov/fund/grant/apply/appforms/appforms.html]
3. You must provide a complete and signed Assurance for Non-Construction Programs Form. [See http://www.ed.gov/fund/grant/apply/appforms/appforms.html]
4. You must provide a signed assurance that you will comply with the requirements of the Act and the provisions of the State plan, including the provision of a financial audit of funds received under the Act which may be included as part of an audit of other Federal or State programs. [Sec. 122(c)(11)]
5. You must provide a signed assurance that none of the funds expended under the Act will be used to acquire equipment (including computer software) in any instance in which such acquisition results in a direct financial benefit to any organization representing the interests

of the acquiring entity or the employees of the acquiring entity, or any affiliate of such an organization. [Sec. 122(c)(12)]

6. You must provide a signed assurance that your State will waive the minimum allocation as required in section 131(c)(1) in any case in which the local educational agency is located in a rural, sparsely populated area or is a public charter school operating secondary school career and technical education programs and demonstrates that it is unable to enter into a consortium for purposes of providing services under the Act. [Section 131(c)(2)]
7. You must provide a signed assurance that your State will provide, from non-Federal sources for the costs the eligible agency incurs for the administration of programs under this Act, an amount that is not less than the amount provided by the eligible agency from non-Federal sources for such costs for the preceding fiscal year. [Sec. 323(a)]
8. You must provide a signed assurance that your State and eligible recipients that use funds under this Act for in-service and preservice career and technical education professional development programs for career and technical education teachers, administrators, and other personnel shall, to the extent practicable, upon written request, permit the participation in such programs of career and technical education secondary school teachers, administrators, and other personnel in nonprofit private schools offering career and technical secondary education programs located in the geographical area served by such eligible agency or eligible recipient. [Sec. 317(a)]
9. You must provide a signed assurance that, except as prohibited by State or local law, that an eligible recipient may, upon written request, use funds made available under this Act to provide for the meaningful participation, in career and technical education programs and activities receiving funds under this Act, of secondary school students attending nonprofit private schools who reside in the geographical area served by the eligible recipient. [Sec. 317(b)(1)]
10. You must provide a signed assurance that eligible recipients that receive an allotment under this Act will consult, upon written request, in a timely and meaningful manner with representatives of nonprofit private schools in the geographical area served by the eligible recipient regarding the meaningful participation, in career and technical education programs and activities receiving funding under this Act, of secondary school students attending nonprofit private schools. [Sec. 317(b)(2)]

PROCEDURAL SUGGESTIONS AND PLANNING REMINDERS

- EDGAR regulations implementing the Drug-Free Workplace Act of 1988 (41 U.S.C. 701 et seq., as amended) are provided in 34 CFR Part 84, “Government-wide Requirements for Drug-Free Workplace (Financial Assistance).” Changes in this Government-wide requirement (adopted in the November 26, 2003 Federal Register Notice) now implement this as a condition of the award. See 34 CFR 84.400.
- EDGAR regulations implementing Executive Orders 12549 and 12689 and Section. 2455 of the Federal Acquisition Regulation are provided in 34 CFR Part 85, “Government-wide Debarment and Suspension (Nonprocurement).” Changes in this Government-wide requirement (adopted in the November 26, 2003 Federal Register Notice) now implement this as a condition of the award. See 34 CFR 85.440. You are also responsible for including a condition in any subgrant and contract that meets the definition for a covered transaction a condition that the lower tier participant must comply with the regulations in part 85. See 34 CFR 85.330.
- Under EDGAR regulations at 34CFR 85.320, your State is responsible for determining whether any of your principals of your covered transactions (i.e. subgrants or contracts) is excluded or disqualified from participating in the transaction. See 34 CFR 85.320. You may

decide the method and frequency by which you do so. You may, but are not required to, check the Excluded Parties List System at the following site: http://www.epls.gov/.

PERKINS STATE PLAN PORTAL

Submit the following documents to the CTE State Plan portal at https://perkins.ed.gov.

- Request to Extend State Plan. Each eligible agency must prepare a brief cover letter, indicating that it wishes to extend its Perkins IV State Plan and transmit the required documents for the upcoming program year. This request must be in writing and signed by a State official who is authorized to act on behalf of the eligible agency. Here you may also submit any updated EDGAR certifications and assurances.
- Updated Budget. Each eligible agency must prepare a budget for the upcoming program year. The budget should be based on the estimated allocation tables that our office will issue under separate cover.
- State Proposed Performance Levels. Each eligible agency must prepare proposed performance levels for each of the core indicators of performance described in section 113(b) of Perkins IV for the upcoming program year. Proposed performance levels must take into account the following factors described in section 113(b)(3)(A)(vi) of Perkins IV: 1) how the levels of performance involved compare with the State-adjusted levels of performance established for other States, taking into account factors including the characteristics of participants when the participants entered the program and the services or instruction to be provided; and 2) the extent to which such levels of performance promote continuous improvement on the indicators of performance by such State.

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(A) CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT).

Pennsylvania will comply with Section 402(a)(A)(i) of the Social Security Act which states that all States must conduct a program, designed to serve all political subdivisions in the State (not necessarily in a uniform manner), that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work and support services to enable them to leave the program and become self-sufficient. • Defining Needy Families A needy family is defined as a minor child and his parent(s) or other adult specified relative with whom he lives who meet the income and resource standards established under this TANF State Plan. Eligibility for TANF is also extended to pregnant women who have no other children living with them. • Minor Child A minor child is under age 18 or is age 18 and a full-time student in a secondary school or in the equivalent level of vocational or technical training. • Specified Relative A specified relative is defined as an adult who: • Is exercising responsibility for the care and control of the child by making and carrying out plans for the support, education and maintenance of the child and applying for assistance on behalf of the child. The finding that a relative is exercising care and control of the child is made whether the relative is the parent or other relative of the child. • Is maintaining a home in which the child lives with him or her, or is in the process of setting up a home where the child will go to live with him or her within 30 days after receiving the first TANF payment. • Is related to the child as follows: - A blood relative who is within the fifth degree of kinship to the dependent child, including a first cousin once removed. Second cousins and more remote cousins are not within the fifth degree of kinship. A first cousin once removed is the child of one's first cousin or the first cousin of one's parent. The fifth degree of kinship includes great-great grandparents and great-great-great grandparents. The fifth degree of kinship also includes other relationships prefixed by great, great-great, grand or great-grand. Blood relatives include those of half-blood. - A parent by legal adoption and any of the adopting parent's blood or adoptive relatives as described above. - Stepfather, stepmother, stepbrother, and stepsister. - A spouse of any of the relatives described above even though the marriage is terminated by death, separation or divorce. • Minor Parent A minor parent is defined as: A TANF eligible individual under 18 years of age who has never been married and is the natural parent of a dependent child living with the minor parent, or is pregnant. A minor parent is required to live in the home of the minor parent's parent, legal guardian or other adult relative who is at least 18 years of age or in an adult-supervised supportive living arrangement unless exempt. If the minor parent cannot return to the home of a parent, legal guardian, or other adult relative, the Department, in consultation with the county children and youth agency, will provide assistance to the minor parent and dependent child in locating a second-chance home, maternity home or other appropriate adult-supervised supportive living arrangement unless the agency determines that the minor parent's living situation is appropriate. When both parents are living with a child, the family may qualify for TANF only if one or both parents are incapacitated, unemployed or employed with earnings that are low enough to qualify the family for supplemental TANF assistance. Certain individuals who live with

the minor child must be included in the application for assistance. These members of the TANF mandatory budget group include the TANF child, the biological or adoptive parents of the TANF child and blood-related or adoptive siblings of the TANF child as long as they also meet TANF eligibility requirements. A family, for purposes of the 60-month time limit, is defined as a minor child and his parent(s) or other adult specified relative with whom he lives and who is applying on the child's behalf. A family does not include a specified relative who is not included in the TANF mandatory budget group and is seeking TANF assistance only for the minor child. • Absence of a Minor Child Under TANF, a specified relative may continue to receive benefits for an otherwise eligible minor child who is absent, or expected to be absent, from the home. The State may choose between several periods of temporary absence: • not less than 30 days, up to 45 days, up to 180 days or more than 180 days if good cause is established. Pennsylvania elects to define temporary absence as one that does not exceed 180 consecutive days. A caretaker relative of a minor child who fails to notify the CAO of the minor child's absence by the end of the five-day period, that begins with the date it becomes clear to the specified relative that the child will be absent for more than 180 consecutive days, is ineligible for TANF for a period of 30 days. Personal Responsibility - The Agreement of Mutual Responsibility Pennsylvania exercises the TANF option to establish an individual responsibility plan, known as the Agreement of Mutual Responsibility (AMR). The AMR is a plan of action the TANF recipient and the caseworker develop together. The purpose of the AMR is to direct the person's efforts toward self-sufficiency by identifying reasonable goals and determining what activities the person will complete to achieve those goals. The AMR is used to identify the person's short-term and long-term goals. The plan addresses how the recipient will overcome identified barriers and lists participation activities and hours of required participation as well as supportive services provided by the Department. The following individuals are required to sign the AMR: • Adult applicants and recipients who are required to sign the Application for Benefits, whether or not they are exempt from or have good cause for not meeting the work requirements. • Pregnant teens or minor parents who sign the Application for Benefits on their own behalf. The AMR stresses the temporary nature of cash assistance and focuses on the steps the recipient must take to establish a path toward self-sufficiency. The AMR also specifies the penalties for failure to comply and the actions to be taken by the Department to support the efforts of the recipient. An individual who refuses to complete or sign the AMR without good cause is ineligible for TANF cash assistance and removed from the cash grant. The person remains ineligible for cash benefits until he or she completes and signs an AMR. The entire family is ineligible if the individual had previously received 60 months of TANF cash assistance which is considered Extended TANF. NOTE: The explanation of the Extended TANF program can be found in Section B "Special Provisions" of this document. As part of completion of the AMR, the CAO determines whether the individual is exempt from or has good cause for not participating in work or work activities. For individuals required to participate in work and work activities, the AMR includes a requirement to conduct an initial job search or participate in a work activity. The initial activity assesses the skills, work experience and employability of each adult recipient. The AMR is also used to outline other work participation activities and obligations for nonexempt individuals. New legislation effective July 1, 2012 changed the penalties for noncompliance, without good cause, with work requirements set forth on the AMR. Pursuant to Act 35, the AMR will include the following obligations, when appropriate to the individual or family situation: • Receive prenatal care as recommended by the doctor or clinic and/or ensure that children are immunized, receive periodic health screening and appropriate medical treatment. • Take steps, if needed, which will improve a child's school attendance and improve his or her chances for earning a high school diploma. • Submit to a substance abuse assessment by the local county drug and alcohol authority if the CAO determines that an individual may have a substance-abuse problem that presents a barrier to employment. If the assessment indicates that a drug or alcohol problem exists, the individual will be required to participate in and complete an approved treatment program as indicated by the local drug and alcohol authority. If an individual fails to enter or complete a program, he or she can comply by providing proof of substance-free status by

submitting to periodic drug testing. • Make appropriate payments to service providers from allowances provided to enable the individual to fulfill his or her commitment to engage in work or a work activity. • Comply with work and work activity requirements. • Meet other obligations specified on the AMR related to self-sufficiency and parenting responsibilities. These obligations are basic personal and parental responsibilities which are important to the physical and mental well-being of the family. If not addressed, they not only represent potential barriers to employment, but could increase the likelihood that welfare dependency will be passed from one generation to the next. The Department established penalties and good cause criteria for noncompliance before implementing sanctions associated with these obligations. Time Limit and Work Requirements for Receipt of TANF Receipt of TANF assistance is limited to a total of 60 months (five years) in the lifetime of an adult head-of-household or spouse of head-of household. The assistance received as an adult (age 18 and over) head of household or spouse of head of household counts towards the limit. Assistance received by a pregnant minor head of household, minor parent head of household or minor married to the head of household also counts towards the limit. Periods of receipt need not be consecutive to count towards the 60 months. If the TANF budget group includes only children, the 60-month limit does not apply. Beginning March 3, 1997, the Department activated both the 60-month TANF time clock and the pre-/post-24 month clock which tracks the number of days of receipt of cash assistance. For applicants, these clocks are activated when cash assistance is authorized. Determining Eligibility Pennsylvania is following rules, regulations and procedures in effect prior to the TANF implementation date, except for the following provisions that are authorized or required by State law (Act 35 and Act 58) or by federal law: • Earned Income Disregard The gross earned income of recipients is subject to a continuous 50% disregard. The disregard encourages recipient families to work and provides additional financial support as they make the transition from welfare to self-sufficiency. Applicants may qualify for the 50% disregard if they have received TANF in one of the four months prior to application or if their income is equal to or less than the standard of need. The deduction for the cost of dependent care for an incapacitated adult is made following application of the 50% disregard. • Reimbursement for Work Expenses Effective March 28, 2009, all TANF families with earned income are eligible for $50 a month as a reimbursement for work expenses. • Income Exclusions Income is excluded as provided in state regulation at 55 Pa. Code §183.81. Funds deposited into a Saving for Education, Entrepreneurship and Downpayment (SEED) account, including interest earned on the account, are excluded as income when determining eligibility. These accounts are currently being funded with private funds as a demonstration project. Funds may be withdrawn for qualified purposes only. If rolled over to a Roth IRA, the money is counted against the resource limit according to 55 Pa. Code Chapter 177, Resources. The policy on SEED accounts became effective April 1, 2006. Earned income from temporary employment with the U.S. Census Bureau is excluded. This policy became effective February 1, 2000. • Resources Resources are excluded as provided in State regulation at 55 Pa. Code §§177.21(a) and 177.22. Funds deposited in SEED accounts, including interest, are excluded as a resource when determining eligibility. The policy on SEED accounts became effective April 1, 2006. • Lump Sum Income Lump sum income is counted as income only in the month that it is received. Any funds that remain from the lump sum in months following the month of receipt are counted as a resource. Final rulemaking for this change was published in the Pennsylvania Bulletin on August 23, 2002. • Budgeting Method: Semi Annual Reporting (SAR) The income of applicants and recipients affects the TANF benefit as follows: • The income adjustment is based on the best estimate of the expected income (prospective budgeting). The estimate is based upon verified information provided by the client. • Monthly income is determined by multiplying the gross average weekly income by four (4.0). • Recipients are required to complete and submit a reporting form once every 12 months. Since eligibility must be reviewed no less often then every six months, a complete redetermination interview occurs in the alternate six-month period. • Recipients are required to report increases in gross monthly earned income in excess of $100 and all other changes such as household composition, address, job start, etc. within the first 10 days of the month following the month of the change. • Recipients are required to report

increases in gross monthly unearned income in excess of $50. • There is no reconciliation of income. No overpayments (underestimates) will be processed unless it was due to a client's failure to properly report income or agency error. Underpayments (overestimates) will not be corrected unless they are the result of a worker error. • An income adjustment that reduces or increases the grant will be made for the first TANF payment date for which the deadline can be met following proper notice to the client. SAR was implemented in May of 2003. The Cash Assistance Handbook is updated to reflect the changes. • Individuals who have some work experience will be referred to the EARN program, which assists with job placement and job training opportunities. At this stage of services, it is anticipated that individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On-The-Job training program or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed. • Individuals who need to rectify some barriers such as literacy, "soft skills" development and support services such as child care and transportation assistance, will be referred to a Work Ready provider. This contracted provider will assist the individual with barrier removal strategies and then refer him or her to the EARN program when he or she is ready. • Individuals who could benefit from a training opportunity at a community college will be referred to the KEYS program. This program enrolls individuals who are ready to learn in a college setting. Once the individual has completed their education at the community college, he or she will be connected to the PA CareerLink® system for job placement assistance.

(B) REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

Participation in Work or Work-related Activities

To increase work participation rates and to promote self-sufficiency, Pennsylvania has adopted a work-first approach to help clients succeed in their pursuit of self-sufficiency. Pennsylvania requires each adult, minor head of household or minor child age 16 or 17 who is not in school to engage in work or an approved employment and training activity. While the Department wants all clients to be engaged in activities, the focus is on those individuals who are required to participate in RESET.

Participation must begin within seven calendar days after authorization of assistance. Participation includes full-time work, job search, education, or training. The work activity requirement may be met by participation in any one or combination of the following:

• Unsubsidized Employment • Subsidized Private Sector Employment • Subsidized Public Sector Employment • Work Experience • On-the-Job Training • Job Search and Job Readiness Assistance • Community Service Programs • Vocational Educational Training • Job Skills Training Directly Related to Employment • Education Directly Related to Employment • Satisfactory School Attendance at Secondary School or in a Course of Study Leading to a Certificate of General Equivalence • Providing Child Care Services to an Individual Who is Participating in a Community Service Program

After 12 months of participation in vocational education, a recipient may continue education or training, but must also participate in another core work activity. Since implementation of RESET in 1997, Pennsylvania has allowed individuals under the age of 22, including pregnant or parenting recipients, to meet the work participation requirement by attending high school or participating in a GED program.

Exemptions

To be considered exempt from RESET requirements, recipients must be:

• under the age of 18 and pursuing a high school diploma or GED; or • an individual with a verified physical or mental disability which temporarily or permanently precludes him from any form of employment or work activity; or

• the parent/caretaker relative of a child under the age of 6 for whom an alternate child care arrangement is unavailable; or • the custodial parent in a one-parent household who is caring for a child under the age of 12 months. Pennsylvania exercises the option to allow this exemption, which is limited to a total of 12 months in the parent's lifetime. The 12 months do not need to be consecutive; or • a parent with a medically-documented need to provide care for a disabled family member living in the home.

An individual who is exempt because of a physical or mental disability is required to participate in a work or work activity when the condition ceases.

A specified relative who is exempt for providing care to a child under the age of six is required to participate in a work or work activity as soon as child care is available.

An exempt individual under 18 years of age is required to participate in RESET upon:

• becoming 18 years of age; • attaining a high school diploma or a certificate of high school equivalency; OR • ceasing to pursue a high school diploma or a certificate of high school equivalency.

An exempt custodial parent in a one-parent household who is caring for a child under the age of 12 months is required to participate when the child becomes 12 months old, the parent chooses to end the exemption, or when the parent has exhausted the 12-month lifetime limit for this exemption.

A parent providing care for a disabled family member living in the home is not considered work eligible and is exempt from participation in RESET. Medical documentation must be provided to support the need for the parent to remain in the home to care for the disabled family member. When the medical need to remain in the home ceases or can no longer be documented, then the parent becomes work eligible and must comply with RESET requirements.

An individual who is exempt may volunteer to participate in RESET. Exempt volunteers may participate in the RESET activity of their choice, provided they meet the eligibility criteria for those activities or programs. Exempt individuals who volunteer to participate in contracted programs must meet all of the requirements of those programs. Such requirements include, but are not limited to, attendance and participation. Exempt volunteers need not conduct an initial job search prior to beginning to participate and are not subject to sanction for noncompliance with the work requirements.

Determinations of exemption will be made using the criteria found in 55 Pa. Code §165.21.

Good Cause

Clients who are mandatory to participate in RESET may be granted good cause from participation in work or work activities. Good cause may be granted due to circumstances beyond a client's control. When determining good cause, the Department will consider all the facts and circumstances. Even after the CAO has made a preliminary determination of the lack of good cause, an individual may offer evidence of good cause to avoid sanction. The Department may grant good cause for up to six months at a time.

Determinations of good cause will be made using the criteria found in 55 Pa. Code §165.52.

NOTE: The time an individual spends in "Exemption" or "Good Cause" status counts towards the 60-month time limit.

Special Allowances for Supportive Services (SPALs) for Work and Work Activities

Individuals who participate in work or work activities specified on their AMR may be eligible for supportive services provided by the Department. Except for child care, payments for SPALs, when approved, will be made by the CAO for actual costs up to the Department's established maximums. The Department promotes the use of community and faith-based organizations when a recipient has the ability to obtain work supports through these types of organizations. Eligibility for child care is determined by the CAO and payments are made by Child Care Information Services (CCIS). In many areas of the state, clothing is provided as required through PA WORKWEAR.

Monitoring of SPALs issued to recipients in support of their RESET participation is necessary to assure that expenditures are verified, required, and used for their intended purpose. If it is determined that a SPAL was issued in error or if the payment was misused, an overpayment referral may be filed.

Education in the Work First Environment

Since the implementation of welfare reform in Pennsylvania, education in the form of literacy initiatives, pursuit of a high school diploma or GED, ESL, Adult Basic Education, post- secondary schooling, and vocational skill training has been a part of the continuum of work activities.

Employment always has been the primary goal of our TANF program. We continue to encourage individuals to begin developing a work history early in their welfare experience.

However, the role of education will continue to be emphasized for individuals who have not been successful in finding employment and are now seeking career advancement in order to move to self-sufficiency.

Some of our current refinements include:

• Counseling and case management provided by CAO and contractor staff. These activities focus on encouraging clients to pursue education that leads to employment in targeted industry clusters designated by the commonwealth's workforce development partners. This assures clients will be

educated in areas where there is a demand in the labor market. • Contracted programs that currently include various courses of education. The Department will strive to maintain these and increase them when appropriate; • Structured outreach efforts that began with post-secondary institutions and will be expanded to include community literacy programs; • Programs and procedures that assist individuals in completing their educational activities; and • Employment and training programs that will assist individuals enrolled in post- secondary education to stay in school and meet the challenges of parenthood as well as those associated with participation in education while working.

Pennsylvania will continue to integrate employment and training efforts designed specifically for welfare recipients into the larger workforce development system at every appropriate point.

Noncompliance with the RESET Program

A sanction is imposed on any nonexempt individual required to participate in RESET who willfully, without good cause:

• Fails to accept a bona fide offer of employment in which the individual is able to engage; • Voluntarily terminates employment; • Fails or refuses to participate in or continue to participate in an available work activity, including work activities specified on the AMR; • Fails to seek employment; • Fails to maintain employment; • Fails to participate for an average of at least 20 hours per week in work or a work activity; or • Fails to apply for work at the time and in the manner as the Department may prescribe.

If good cause is not established, the individual will receive an Advance Notice advising of the proposed sanction. The sanctions for failure to comply with the work or work activity requirements are required by 62 P.S. §432.3.

Sanctions for Failure to Comply with RESET Requirements

A mandatory RESET participant who willfully fails to cooperate with the work or work activity requirement, participate in RESET or accept a bona fide offer of employment, or who terminates employment, or fails to apply for work, without good cause, shall be disqualified from receiving cash assistance.

The period of the sanction is:

• First sanction: The noncompliant individual in the budget group will be sanctioned for a minimum of 30 days. The sanction will continue until the individual demonstrates and maintains compliance for at least one week and thereafter, or establishes good cause or an exemption. After 90 days of noncompliance, the entire budget group will become ineligible and will remain ineligible until the noncompliant sanctioned individual demonstrates and maintains compliance for at least one week and thereafter, or establishes good cause or an exemption.

• Second sanction: The noncompliant individual in the budget group will be sanctioned for a minimum of 60 days. The sanction will continue until the individual demonstrates and maintains compliance for at least one week and thereafter, or establishes good cause or an exemption. After 60 days of noncompliance, the entire budget group will become ineligible and will remain ineligible until the noncompliant sanctioned individual demonstrates and maintains compliance for at least one week and thereafter, or establishes good cause or an exemption.

• Third sanction: The entire budget group is permanently disqualified.

In lieu of the sanctions set forth above, if an employed individual voluntarily, without good cause, reduces his earnings by not fulfilling the minimum work requirement, the cash grant is reduced by the dollar value of the income that would have been earned if the individual would have fulfilled his minimum hourly work requirement, until the minimum hourly work requirement is met.

The Department has opted not to impose a sanction on Medical Assistance benefits for recipients who fail to comply with work and work activity requirements.

Supporting Employment with Child Care

The Department has provided information about subsidized child care benefits available under the "Child Care Works" program in the Child Care Development Block Grant State Plan submitted for the period October 1, 2013 through September 30, 2014. Child care costs are paid through the Child Care and Development Fund (CCDF), except for child care costs of employed individuals who receive TANF, which are paid through commingled TANF funds. Support for child care costs for eligible TANF recipients participating in approved work activities provides access to a full range of child care opportunities.

To help ease the transition for individuals whose TANF benefits end but their need for child care continues, Pennsylvania has implemented Child Care Unification. Verification requirements are also less stringent for individuals who contact the Child Care Information Services (CCIS) in a timely manner to apply for Former TANF child care benefits.

During the period of November 1, 2006 through June 1, 2007, unification of subsidized child care services was implemented throughout the state. As a result, the CCIS agencies are responsible for the issuance of all subsidized child care statewide. The CAOs are still the eligibility agent for TANF recipients in need of child care, but refer these families to the CCIS agencies for child care enrollment and payment.

Unification of the subsidized child care program promotes a local focus on clients and families, streamlined and provided through a single office that can more effectively manage resources and provide services to a greater number of eligible families. Unification insures that all low- income families get the help of professionals trained to assist with their child care needs and receive information on the benefits of quality child care and early education. It also provides subsidy providers with a single point of contact – the CCIS. All child care providers must now sign a provider agreement which results in payments going directly to the provider.

The CCIS agencies also determine eligibility and issue child care payments for working persons who previously received TANF cash assistance or that have income at or below 235 percent of the FPIGs for their family size. Individuals must either have previously received TANF cash assistance or have income at or below 235 percent of the FPIG and be meeting the work requirement established by DHS. In order to be potentially eligible for child care under the Former TANF program, the parent/caretaker must:

• Contact the CCIS within 183 days of the date his/her TANF benefits ended. If the CCIS is contacted on day 184 or later, the parent/caretaker is no longer eligible to receive Former TANF child care. Eligibility will then be assessed under the Low Income child care program.

• Be working and have a need for child care. The parent/caretaker must be working an average of at least 20 hours per week (this may include training, but at least 10 hours per week must be work) no later than the 184th day following the date TANF ended.

When TANF cash assistance ends and a need for child care exists, verification requirements are less strict at the CCIS if the parent/caretaker contacts the CCIS within 60 days of TANF benefits ending. If no changes have occurred for the parent/caretaker within the 60 days following TANF closing and the CCIS is contacted during that period, the parent/caretaker may self-certify required information. Additional verification is not required to receive Former TANF child care.

If the parent/caretaker contacts the CCIS within 60 days and changes have occurred since TANF closed, or contact with the CCIS is made beyond the 60 day period, the parent/caretaker must provide verification for all required information. Families who previously received TANF benefits may apply for and potentially be found eligible for Former TANF child care up to 183 days from the date TANF closed. Consumer education materials and information about minimal health and safety standards are available to all TANF clients and participating providers. Information about child care options, as well as availability and location of care, continues to be available through the Department's contracted CCIS agencies. CCIS agencies offer a parent counseling system that educates participants on the importance of quality early education and child care services. The counseling system also educates parents/caretakers on how to secure high- quality child care in the neighborhood.

CCIS agencies provide resource and referral services to all TANF clients participating in the Department's employment and training programs. These resource and referral services educate parents/caretakers about:

• CCIS services • Child care choices • Impact of child care choice on care and early development and the school readiness of children • Impact of child care choice on ability to retain employment

Parent counseling is also available at the employment and training site on an optional basis to any TANF client seeking the service and on a mandatory basis for TANF clients demonstrating poor attendance at the program or an inability to retain employment due to unstable child care arrangements. This initiative meets TANF purpose number two – end dependence of needy parents on government benefits by promoting job preparation, work and marriage.

(C) ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT)

Pennsylvania will comply with Section 402(a)(A)(iii) of the Social Security Act. The County Assistance Office will assist all individuals who are required to work to find opportunities through the EARN program and the PA CareerLink® system. Both of these services can be accessed locally and each person will be able to get individualized services. These services include job placement assistance, career counseling and training opportunities within a career pathway.

(D) TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE

TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

Pennsylvania continues to operate its welfare program in a manner that safeguards information about individuals and families receiving assistance. Pennsylvania adheres to the provisions on the safeguarding of information in effect prior to implementation of TANF, with the addition of the following provisions:

• The Department of Human Services (DHS) receives information from the Pennsylvania State Police, the Pennsylvania Board of Probation and Parole, the State Department of Corrections, county law enforcement and corrections agencies, and local law enforcement and corrections agencies. This information is used for eligibility purposes, i.e., to identify individuals who have been sentenced for a felony or misdemeanor and have not satisfied the penalty imposed by law, fugitive felons and individuals convicted of drug-related felonies. Information received on individuals who have a drug-related felony conviction is important only insofar as DHS may need to refer the individual to assessment/treatment.

• DHS will furnish the current address of a recipient to a Federal, State or local law enforcement officer who certifies that the location or the apprehension of the recipient is within his official capacity.

• However, DHS will furnish the address only on the request of the officer and only if the officer furnishes the Department with the name of the recipient and states that the recipient is fleeing to avoid prosecution, or custody, or confinement after conviction for a felony or high misdemeanor under State law, or the recipient has information that is necessary for the officer to conduct his official duties.

• DHS will disclose information to entities outside the Department when necessary for restitution or collection of assistance benefits; to cooperate with IV-D agencies to enforce child support orders and paternity determination; or to protect the welfare of children and adults who are unable to manage their own affairs or otherwise protect their rights when the information is needed to get services the client has requested and the services will advance the client's welfare and the client has authorized the Department to release specific information to the agency.

• DHS will protect the rights of individuals to reasonably ensure that the information will be used for purposes associated with assistance, that the receiving agency will use the information only for the purpose for which it was made available, and the standards of confidentiality are at least equal to that of the Department.

(E) ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

Pennsylvania has several initiatives in place aimed at preventing teen pregnancy (reducing out of wedlock births).

• Through a grant agreement with AccessMatters reproductive health services are provided to high school students in Philadelphia and Delaware counties through the Health Resource Center (HRC) Program. Services include: counseling and education about abstinence, health, and sexuality,

information about making responsible choices about reproductive health and relationships, sexually transmitted disease (STD) screening and pregnancy testing, and referrals to school, community based resources, and the family planning network for free or low-cost reproductive health services. Currently AccessMatters is issuing a Request for Proposals (RFP) to expand the HRC model from the Philadelphia region to nine additional counties with high rates of teen pregnancy, sexually transmitted infections (STI) and school dropouts. The nine additional counties are: Allegheny, Beaver, Berks, Dauphin, Fayette, Lackawanna, Lehigh, Lycoming, and Venango. HRC sites will screen all adolescents utilizing HRC services for adolescent relationship abuse and will enter into an agreement with the Department's STD program for STD testing.

• In September 2010, the Department was awarded funding from the Administration for Children and Families for the Personal Responsibility Education Program (PREP). PREP is a statewide project that serves adolescents in licensed residential programs serving delinquent children, youth development centers, youth forestry camps, licensed residential drug and alcohol treatment facilities, psychiatric residential treatment facilities, licensed partial hospitalization or outpatient drug and alcohol facilities, and licensed partial hospitalization or outpatient mental health facilities (implementation sites). The goal of the PREP is to empower adolescents to change their behavior in ways that will reduce their risk of becoming infected with HIV, other STDs, and their risk for pregnancy. Implementation sites are providing education on abstinence, contraception, and at least three adulthood preparation subjects: healthy relationships, adolescent development, and healthy life skills by implementing one of two curricula: Rikers Health Advocacy Program or Street Smart. Training is provided to staff at implementation sites on lesbian, gay, bisexual, transgender, and questioning (LGBTQ) cultural competency. The Department recently selected new PREP implementations sites through a Request for Applications (RFA) to begin services October 1, 2015. The first RFA was completed in early summer 2015, and twelve sites were selected. The Department added five additional sites through a second RFA. Schools, not-for-profit 501 (c) (3) organizations, city or county health departments, and community-based health or human services agencies serving at- risk youth have been added to the list of eligible PREP implementation sites, and sites may choose from a list of twenty approved evidence-based curricula.

• Through Grant Agreements with Pennsylvania's four regional family planning councils, comprehensive reproductive health services are provided to sexually active adolescents 17 years of age and younger. These services include routine gynecological care, pregnancy testing, contraceptives, cervical cancer exams, screening and treatment for sexually transmitted infections, and education/counseling. These services are provided in every county in the Commonwealth through a network of family planning provider sites.

The Department is using an approach that utilizes evidence-based or evidenced-informed programming that combines mentoring, adult-supervised activities, adult-led group discussions, and parenting education as a means to increase the protective factors of youth ages 9-14. By utilizing the Search Institute's 40 Developmental Assets framework, youth will be provided with building blocks for healthy development to help them grow into healthy, caring and responsible young adults. The Search Institute's developmental assets framework includes 20 external assets organized under the following four categories: support, empowerment, boundaries and expectations, and constructive use of time; and 20 internal assets organized under these four categories: commitment to learning, positive values, social competencies, and positive identity. The developmental assets serve as protective factors to help youth avoid negative risky behaviors. The positive effects of these protective factors increase as the number of assets a youth has increases. Enhancing the developmental assets of youth provides an opportunity for them to transition into sexually healthy adolescents who are able to realize their individual potential around critical developmental tasks

related to sexuality. Services are focused on adolescents and provided by current contractors. These initiatives are funded with 100 percent federal funds. In 2013, there were 139,606 births in Pennsylvania, of which 58,129 or 41.6 percent were out-of-wedlock. Of the out-of-wedlock births, 8,180 or 14 percent were to women 19 years of age or younger. As outlined in the table below, even as the total number of out-of-wedlock births increased or decreased, the number of out-of-wedlock births to women 19 years of age or younger decreased gradually, but consistently, from 2002 to 2013. This is the most recent data as of November 2015.

Year Births Out-of-Wedlock Out-of-Wedlock – 19 years of age or younger 2013 139,606 58,129 (41.6%) 8,180 (14%) 2012 140,146 58,744 (41.9%) 9,514 (16.1%) 2011 141,300 58,879 (41.7%) 10,292 (17.5%) 2010 141,681 58,727 (41.5%) 11,355 (19.3%) 2009 144,627 59,194 (40.9%) 12,037 (20.3%) 2008 148,166 60,269 (40.7%) 12,905 (21.4%) 2007 149,717 59,466 (39.7%) 12,966 (21.8%) 2006 148,706 56,749 (38.3%) 12,683 (22.4%) 2005 145,033 52,849 (36.5%) 12,036 (22.8%) 2004 144,494 50,487 (35.2%) 11,772 (23.4%) 2003 145,485 48,985 (33.9%) 11,833 (24.2%) 2002 142,380 47,519 (33.5%) 11,879 (25%)

(F) CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

Prevention Education/Public Awareness Activities: The Pennsylvania Coalition Against Rape's (PCAR) effort to reduce sexual violence has shifted to changing societal norms that reinforce gender–based violence and promoting healthy relationships. Research provided by the Centers for Disease Control and Prevention consistently shows that while programming to teens is important, it is only one component of prevention. Perhaps the most important component is involving the community in prevention by teaching about how stereotypes reinforce gender–based violence (community could be defined as a city, town, college campus, high school, or peer group). Resources and training provided by PCAR assist rape crisis centers in developing comprehensive prevention plans that include parents, teachers, staff, students, and bystanders. PCAR is requiring multiple sessions with groups, rather than the single, risk reduction programming typically provided to schools. These prevention activities are funded by Title XX and Rape Prevention and Education. PCAR's 50 sub–grantees continue to use PCAR's initiatives and materials to enhance their own prevention education programming within their respective communities. The following initiatives continue to be used throughout Pennsylvania. Please note that none of these initiatives are funded with TANF funds. Continuing initiatives include:

1. Use of multi–media including websites, Facebook and Twitter:

PCAR continues its use of several websites. These websites provide information about healthy relationships and sexual violence awareness and prevention, in addition to providing resources for teens to seek help. During FY 2014–2015, the PCAR website (www.pcar.org) had 255,940 page views. The content for the Teen PCAR website was relocated on the www.pcar.org site; this is to keep the content more current and active. The TeenPCAR site had become static and the number of visits were dropping. PCAR has also developed a Facebook page which it updates daily and has begun using Twitter (@PCARORG) to communicate upcoming events. As of June 30, 2015, the Facebook page has 2,081 likes and 405 new followers. PCAR has 4,023 followers on Twitter and

had 9,849 tweets, 1,593 known retweets and 467 mentions during FY 2014–2015. Social media activity continues to be a growth area.

2. Sexual Assault Awareness Month: The 2015 theme for Sexual Assault Awareness Month was Safer Campuses, Brighter Futures. PCAR's Communications team distributed promotional items to rape crisis centers throughout Pennsylvania for Sexual Assault Awareness Month. This year's items included stress balls, teal ribbon pins, and lip balm. Although the campaign focused on campus sexual assault materials could be modified for use in middle and high schools. The communications team also developed several blogs and social media efforts to engage the community regarding the topic of sexual violence.

3. Engaging men: The Engaging Men initiative still continues through the PCAR website to include tips on engaging men. In addition, training about providing counseling to male survivors, engaging men and boys in the prevention of sexual violence, and other similar topics is available to local rape crisis centers.

4. Development and Distribution of Print materials: PCAR Resource Materials During FY 2014–2015, the Communications Department and the Training and Technical Assistance Team worked to update and/or develop the following resource materials. Among the materials were the following: Public Awareness; Bi–weekly mailings: 27 issues per year; PCAR newsletter: The Horizon– July 2014, October 2014, April 2015; PCAR Annual Report– January 2015

Manuals: Parents in the Know Parents' Journal (English and Spanish) Facilitator's Guide (English and Spanish) Primary Prevention and Evaluation Resource Kit Volume 1: Choosing Prevention Strategies Volume 2: Evaluating Prevention Strategies Volume 3: Analyzing Evaluation Data Volume 4: Analyzing Qualitative Data Prison Rape Elimination Act (PREA) – updated October 2014 Facts about Sexual Assault in Prison Prison Rape Elimination Act (PREA): A Pennsylvania Perspective Commonly Used Terms in Prisons How to Implement an Institution–Based Sexual Assault Response Team What Happens when a person is incarcerated Working with Victims who are Inmates Understanding Rape in Prison

Factsheets Budget Advocacy – May 2015 Legislative Priorities – April 2015 Policy Brief: Termination of Parental Rights of Convicted Rapists – March 2015 Gov. Wolf Transition Agenda – December 2014 Act 31/HB 431: Education and Training – March 2015 Act 32/HB 436: Privileged Communications and penalties for failure to report or to refer Act 33/SB 21: Omnibus Amendments (Reporting Child Abuse) Act 105: Trafficking of Individuals – April 2015 Act 107: Custody and Child Welfare Involvement – March 2015 Act 108: Amendment to Child Abuse definition – March 2015 Act 117/SB 23: Expunction of child abuse perpetrators under 18 when offense was committed – March 2015 Act 118: Increased penalties for simple assault, aggravated assault and false reporting of child abuse

Brochures What is Sexual Violence (English and Spanish) Mandated Reporting Sexual Violence: Men & Boys (December 2014) (English and Spanish)

Guides Police Response to Sexual Assault – November 2014 A Guide for Friends and Family of Sexual Violence Survivors – updated April 2015

Infographics Funding Pennsylvania's Rape Crisis Centers – July 2014 Understanding the Age of Consent in Pennsylvania – May 2015 Pennsylvania Sex Offense Statute of Limitations: Criminal Charges – October 2014

Technical Assistance Bulletins Survivors in Crisis: Suicide Prevention and Intervention technique for sexual assault – October 2014 How Community Partners Can Work with Students on Title IX – February 2015

Talking points NFL Ray Rice Incident– September 2014

5. Training/Resources to Increase the Capacity of Rape Crisis Center's to Outreach in Their Communities:

This initiative includes PCAR's provision of training at the Annual Statewide Sexual Assault Conference. The following workshops in the prevention track were offered at the conference:

• Using Intersectionality to Engage Men in Primary Prevention Efforts

• Primary Prevention: Using a Social Norms Approach with Middle School & High School Students

• Engaging Student Athletes in Prevention

• Linking the Roads: Working with Youth who Experience Homelessness & Sexual Violence

• Primary Prevention Resource Took Kit

• Activating the Community to Engage in Prevention

• Human Trafficking of Children

In addition to the Annual Statewide Sexual Assault Conference, PCAR provided a number of trainings to local rape crisis centers during FY 2014–2015. Some of the topics included: Victims' Response to Sexual Assault Trauma Informed Response to Sexual Violence Trauma Informed Investigation of Sexual Assault New PA Child Protection Legislation Parents In The Know (Curriculum developed by PCAR) Preventing Child Sexual Abuse Working with the Media Self–injury Mandated Reporting Mandatory Reporting: Maintaining Relationships with the Youth We Serve Human Trafficking Human Trafficking in Pennsylvania Campus Sexual Violence Play Therapy for Traumatized Children Sexual Abuse of Children in Farmworker and Immigrant Communities Technology and Human Trafficking LGBTQ Inclusivity Prison Rape Elimination Act (PREA)

(G) IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

Pennsylvania continues to operate the TANF Program based on the rules and regulations for delivery of benefits in effect prior to implementation. Eligible recipients receive continuing benefits in two semi–monthly cash payments delivered primarily through the Electronic Benefits Transfer (EBT) System.

Pennsylvania prevents assistance provided under the TANF program from being used in EBT transactions in liquor stores, casinos and adult–oriented entertainment establishments, in which performers disrobe or perform in an unclothed state for entertainment, in the following manner:

• Pennsylvania statute 62 P.S. § 484, enacted December 2009, prohibits the purchase of liquor or alcohol with an EBT card. 62 P.S. § 483 violators will be guilty of a misdemeanor and sentenced to pay a $100 fine and/or six months in jail. The Pennsylvania Liquor Control Board (PLCB) is responsible for enforcing this at PLCB Wine and Spirits shops. PLCB does not subscribe to Quest point–of–sale devices and cannot accept EBT cash benefits. In addition, there are no ATMs located in PLCB Wine and Spirit Stores.

• In 2010, Pennsylvania's Gaming Commission asked third party processors to block, voluntarily, the use of the EBT card BIN (Bank Identification Number) at their ATMs in all twelve of Pennsylvania's casinos. DHS completed initial testing of the voluntary agreement at four new Pennsylvania casinos in April 2011. The EBT Risk Management Unit (EBT RMU) performs ongoing testing by screening all EBT transactions to identify any conducted at the twelve casino addresses. To date, the EBT RMU found only four transactions at a casino address, and, upon further analysis, learned that the withdrawal was at an ATM at that address but not affiliated with the casino.

• In December 2013, Pennsylvania added language to the signed affidavit page of Pennsylvania's Common Application and Benefits Review forms and on the Agreement of Mutual Responsibility, which prohibits the use of TANF funds through EBT transactions in liquor stores, casinos and places for adult entertainment. Pennsylvania also expresses this language on the electronic COMPASS application process. The Prohibitions and Penalties page of Pennsylvania's Common Application and Benefits Review forms also warns that misuse of the EBT care of PA Access Card, without good cause, may result in a fine, prison or both. DHS has not promulgated regulation to impose a penalty for using TANF assistance via EBT transaction in liquor stores, casinos or adult entertainment establishments; however, DHS is working with Pennsylvania's General Assembly to draft public law making misuse punishable.

• In order to monitor the misuse of TANF assistance through EBT transactions, the EBT RMU developed a naming convention and address recognition protocol that identifies liquor stores, casinos and adult entertainment establishments. The EBT RMU screens all cash transactions on three randomly selected dates per month using the pre–determined key words. The EBT RMU also screens all cash transactions using the keyword "liquor" for the entire month. Staff reviews each questionable transaction to determine if the recipient used TANF assistance through EBT transaction in a liquor store, casino, or adult entertainment establishment. Staff reviews each location to see whether it meets the criteria for a retail establishment that provides adult–oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

• DHS has elected to send letters to individuals with prohibited transactions reminding them not to use their TANF assistance at one of the prohibited locations. Since 2014, DHS has sent 39 letters to individuals found to have used their EBT card at out–of–state liquor stores and one who had used their EBT card at an establishment that provides adult–oriented entertainment in which performers disrobe.

(H) ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE

PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

Pennsylvania continues to provide access to TANF benefits and related services in each of the commonwealth's 67 counties based on the policies and procedures in effect. During Fiscal Year 1997–98, Pennsylvania implemented a Statewide Electronic Benefits Transfer (EBT) system to replace the paper–based welfare benefits issuance system. EBT is a state–of–the–art means for electronically issuing welfare recipient benefits through a statewide network of automatic teller machines (ATM) and point–of–sale devices to electronically deliver cash assistance and SNAP benefits throughout the commonwealth.

Pennsylvania TANF recipients may access their benefits at ATMs located throughout all 67 counties in banks, grocery stores, shopping centers and gas stations. The ATM tells the user that a surcharge will be charged and, if he or she does not want to pay it, the ATM provides the option to cancel the transaction. Many ATMs do not charge any transaction fee for use.

Pennsylvania's TANF recipients may use their EBT cards at any store that accepts the Pennsylvania EBT card. Use of the EBT card in stores is a cost–free transaction for the recipient. Recipients may access their benefits at no cost by requesting cash after a POS purchase and access their benefits without penalty.

Pennsylvania provides recipients information about using EBT to access benefits and potential fees:

• Online at the Pennsylvania EBT Website (https://www.ebt.acs–inc.com/paebtclient/index.jsp) • When the recipient creates his or her unique EBT PIN at the County Assistance Office. • On the Pennsylvania Department of Human Service website. (http://www.dhs.state.pa.us/foradults/supplementalnutritionassistanceprogram/electronicbenefitstransferebt/S_001060) • In the Pennsylvania Cash Assistance Handbook, available to the public online. • When making an ATM transaction, the ATM displays transactions fees. The transaction will not continue if the user declines the fees.

Pennsylvania provides a 24/7 toll–free EBT hotline (1–888–EBT–PENN or 1–888–328–7366) that recipients can call to:

• Find out where the EBT card can be used. • Check SNAP and cash assistance account balances. • Report that an EBT card has been lost or stolen. • Report that the EBT card does not work. • Ask question about using the EBT card.

(I) INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

Pennsylvania does not treat families moving into the State differently than current residents.

(J) INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Pennsylvania is exercising the options available in Title IV of PRWORA to continue or to authorize TANF benefits for non–citizens who are "qualified aliens," as defined by PRWORA, and who meet all other eligibility requirements.

(K) SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Earned Income: Sanctioned, Disqualified or Otherwise Ineligible Individuals

The earned income of sanctioned, disqualified or otherwise ineligible budget group members is now treated uniformly by computing their income as if these individuals were included in the budget group. This proposal ensures equitable treatment of all TANF households. This policy became effective August 2005. Individuals who have been sanctioned can get an appointment to discuss how to remedy the situation. It is the intention of the County Assistance Office to treat all persons fairly and help them to connect to services that leads to employment and hopefully self–sufficiency.

Right to Appeal: Pennsylvania will continue to follow the appeal and fair hearing regulations and procedures consistent with 55 Pa. Code Chapter 275.

(L) INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

As established by Act 35, recipients of TANF in Pennsylvania are enrolled in an employment and training program known as the Road to Economic Self–sufficiency through Employment and Training (RESET) to enable them to obtain employment and become self–sufficient. The primary means to achieve self–sufficiency is through work. The program emphasizes a work–first approach as part of a continuum of services which can establish a work history, with increasing wages and benefits that lead, over time, to economic independence and self–sufficiency.

A review of demographic data shows that the number of Pennsylvanians age 65 and older is rapidly increasing. This trend is projected to continue through the year 2020. In response to the anticipated need for trained workers to assist in providing quality service to this population, Pennsylvania is considering plans to best determine how to assist individuals to train for, seek, and maintain employment providing direct care in a long–term care facility or in other occupations related to elder care.

(M) PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICECS ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

Pennsylvania provides the following MOE-funded services: • Child Care Provided to Employed Families This initiative is funded with commingled funds. Effective July 2000, this initiative provides subsidized child care benefits to eligible employed families who need child care to participate in unsubsidized employment, subsidized employment and/or education/training activities. Eligibility for this initiative is limited to needy families, as defined in this State Plan, who have a gross annual earned income that does not exceed 235% of the FPIGs. The parent or responsible adult must be a current or former TANF recipient and must be working a number of hours established by the Department as a means to support the parent's transition to self-sufficiency. This initiative meets TANF purpose number two – end dependence of needy parents on government benefits by promoting job preparation, work and marriage. • The ELECT Initiative The ELECT initiative is funded through TANF Federal funds. Effective July 1, 2012, the Education Leading to Employment and Career Training (ELECT) Initiative became a joint venture between the Pennsylvania Department of Education (PDE) and Office of Child Development (OCDEL). Effective July 1, 2015, the Office of Maintenance (OIM) acquired oversight of the ELECT program and will be working collaboratively with PDE to manage the program. Funds are now transferred from DHS to PDE through a Memorandum of Understanding for the administration of this program. The ELECT initiative is designed to assist parents of minor children, including expectant parents, to return to or remain in school, prevent repeat pregnancy, maintain attendance, obtain their high school diploma or GED, develop responsible parenting skills, and secure post-graduation employment, education, or training that will help them become successful parents and self- sufficient adults. Acknowledging paternity is not required to participate. To be eligible for the ELECT or ELECT-Fatherhood Initiative, an applicant must: 1) Be a student of the ELECT or ELECT-Fatherhood Initiative; AND 2) Be a custodial or non-custodial parent of a minor child; AND 3) Have gross earned income that does not exceed 235 percent of the FPIGs. NOTE: The student does not have to be employed to qualify for services. The income of the student's parent(s) is not used to calculate eligibility; AND 4) Not be participating in any employment or training program funded through DPW, including the job retention periods required under those programs. This initiative meets TANF purpose number two, which is to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage; purpose number three, which is to prevent and reduce the incidence of out-of-wedlock pregnancies; and purpose number four, which is to encourage the formation and maintenance of two- parent families. • Family Savings Account This initiative is funded with federal and state match funds. The Pennsylvania Family Savings Account (FSA) program became operational in 1998. This initiative is administered by the Department of Community and Economic Development (DCED). The

FSA program first received Assets for Independence (AFI) support in FY 1999. Since that time, DCED has allocated over $25 million in State and Federal funds to the program. Funding sources have included the AFI program ($9,582,000); State appropriations ($10,228,000); the Temporary Assistance for Needy Families (TANF) program ($6,000,000); and the Community Services Block Grant (CSBG) program ($46,000). The FSA program allows participants to use FSA savings toward the following allowable assets: homeownership, postsecondary education or training, business capitalization, home repair, car purchase, computer purchase (if the car or computer is related to employment or education). Federal AFI funds are used to match savings for any of these asset purchases. Starting in 2000, participants have been allowed to put their FSA savings in a Section 529 college savings plan to save for future post-secondary education. FSA account holders do not have to be the beneficiary of the college savings plan. For example, a grandparent may save for a grandchild. Participation in the FSA Program is limited to recipients of TANF and other eligible individuals and working families whose earned income at the time of enrollment is not more than 200 percent of the FPIGs. This initiative meets TANF purpose number two which is to end dependence of needy parents on government benefits by promoting job preparation, work and marriage, and is operated under 42 U.S.C.A. § 404(a)(1). This program has not been funded in the budget for the past 8 years. • Nurse-Family Partnership This initiative is funded with commingled funds. Effective October 2001, this initiative provides home visitation management services to eligible low-income, first-time mothers only. The home visitors are nurses who follow guidelines that focus on the mother's personal health, quality of care provided to the child and the parent's own life-course development. The purposes of this initiative are as follows: • Improve pregnancy outcomes by helping women engage in good preventative health practices including obtaining thorough prenatal care from their health care providers, improving their diets and reducing use of cigarettes, alcohol and illegal substances. • Improve child health and development by helping parents provide more responsible and competent care for their children. • Improve families' economic self-sufficiency by helping parents develop a vision for their own future, plan future pregnancies, continue their education and find jobs. Eligibility requirements for this initiative are as follows: • Must be enrolled into the program by 28 weeks gestation; and pregnant with the first child, and • Must have a gross annual earned income that does not exceed 235 percent of the FPIGs This initiative meets TANF purpose number two, which is to end dependence of needy parents on government benefits by promoting job preparation, work and marriage and purpose number three, which is to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies. • Head-Start Collaboration Project This initiative is funded with TANF Maintenance of Effort (MOE) funds. This initiative offers classroom services or home visits to children from age three to five and their families. There are 38 grantees and 5,567 children served. Programs can serve children either as new enrollments or extending the day for existing children. If programs choose the latter, they must add a full half day to make a full day. As mandated by the Head Start performance standards, Head Start grantees provide an educational program and comprehensive family-oriented services including parent education, early education enrichment, health, nutrition, family goal setting, literacy and intervention programs that support the child success in school and the community and support the family's education and training enabling them to make educated decisions. Eligibility requirements for the HSSAP year funding are as follows: • Must be a Head Start/Early Head Start grantee or delegate agency, and • Must use the grant to provide Head Start services to children from low-income families who meet the Head Start eligibility criteria (whose incomes do not exceed 130 percent of the FPIGs). The Pennsylvania Pre-K Counts program provides high-quality early childhood education to Pennsylvania children in diverse settings, ranging from school-based programs, Keystone STARS 3 and 4 child care centers, private academic preschool and Head Start agencies. This initiative meets TANF purpose number two, which is to end dependence of needy parents on government benefits by promoting job preparation, work and marriage and TANF purpose number three, which is to prevent and reduce the incidence of out-of- wedlock pregnancies and establish annual numerical

goals for preventing and reducing the incidence of these pregnancies. • Pennsylvania Pregnancy and Parenting Support Services Program This initiative is funded with 100 percent segregated Federal funds. Effective July 2002, this initiative provides pregnancy and parenting support to women in need. The program primarily provides information and counseling that promote childbirth instead of abortion and assists pregnant women in their decisions regarding adoption or parenting. Services are free to women participating in the program. Eligibility requirements for this initiative are as follows: • A woman must be pregnant, or suspect she is pregnant, or be the parent of an infant less than 12 months of age, and • Have a gross annual earned income that does not exceed 185 percent of the FPIGs. This initiative meets all four TANF purposes. Additional Information TANF PURPOSE This document outlines and updates the Commonwealth of Pennsylvania's plan for providing assistance to families with children from funds provided under Title I of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 (P.L. 104-193), and the TANF Final Rules published in the Federal Register on April 12, 1999. The Act amends Section 402 of the Social Security Act to require that states submit a plan to the U.S. Department of Health and Human Services (DHHS) that outlines how the state will provide Temporary Assistance for Needy Families (TANF) benefits. Implementation was effective March 3, 1997. Submission of this State Plan renewal commits Pennsylvania to continue operation of its TANF State Program. Implementation was effective October 1, 2014. II. INTRODUCTION On May 6, 1996, Act 1996-35 (Act 35) was signed into law. It was a dramatic welfare reform plan designed to move families off the welfare rolls and into the work force. The provisions of the Act encourage personal and parental responsibility, emphasize self-sufficiency through employment, strengthen child support requirements, and increase penalties for welfare fraud. It is a common-sense approach that provides Pennsylvania with the core components for reform of our welfare system. The TANF provisions of PRWORA provided the opportunity to make that reform a reality. When signed into law on August 22, 1996, PWRORA ended the 60-year federal welfare entitlement program known as Aid to Families with Dependent Children (AFDC) and the Federal JOBS employment and training program. In its place, each state was provided with a block grant for designing and operating its own welfare program within broad TANF requirements. These requirements include stringent work activity participation rates and a lifetime limit of five years for the receipt of benefits. The TANF Block Grant and the Final Rules published in the Federal Register on April 12, 1999, provided Pennsylvania with the opportunity to build on the core components of Act 35 to create a welfare system that makes the best use of welfare dollars. The Final Rule for reauthorization of TANF, published in the Federal Register on February 5, 2008, added definitions for each accountable core activity, defined a work-eligible individual, changed the base year for determining caseload reduction from FY 1995 to FY 2005 and required states to submit a Work Verification Plan explaining how hours of participation are documented for each core activity. Pennsylvania's changes to the work requirements in this State Plan were necessitated by the Final Rule. The TANF Program in Pennsylvania is designed to provide short-term assistance to families when the support of one or both parents is interrupted. It also provides supplemental support when family income from employment and other sources is not sufficient to meet basic needs. It is not intended to provide long-term support or become a way of life. Families undergo assessments of skills, employability and are required to engage in activities that enhance self-sufficiency and ensure the well-being of their children. The provisions of the TANF Program are intended to meet one or more of the following basic purposes of this program as articulated in the federal statute and regulation: • Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives; • End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; • Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and • Encourage the formation and maintenance of two-parent families. Pennsylvania's TANF Program does not discriminate on basis of race, color, national origin, disability, age, or sex. Additionally, no person will be denied TANF services and benefits as the result of the inability or limited ability to communicate in the English

language. III. PROGRAM GOALS The primary goal of Pennsylvania's TANF Program is to provide support to families as they make the transition from dependence on welfare to self-sufficiency and, finally, to long-term self-support. The following goals provide the framework on which the Program is designed: 1. Promote Personal Responsibility Pennsylvania's TANF Program is based on the principle that welfare should provide temporary cash assistance to families and individuals, providing basic support that enables them to move to self-sufficiency. Inherent in this belief is the notion that the welfare recipient must be personally responsible for taking the necessary steps to end his or her dependence on a welfare "check." 2. Ensure Participation in Work or Work-related Activities As a result of the federal TANF Reauthorization legislation and to improve work participation rates, Pennsylvania requires every adult, minor head of household and minor child age 16 or 17 who is not in school participate in approved activities as part of their plan for self-sufficiency. Refer to Section VI. A. General Provisions, 9. Work and Self-sufficiency, for further discussion. 3. Move Recipients into Jobs For most recipients, the way to self-sufficiency and economic independence is through a job. Pennsylvania's approach provides the client with the opportunity to build work skills and a work history. Pennsylvania is adopting a "Work First" approach to help TANF recipients move from welfare to work. 4. Provide Work Incentives and Supports If we are to encourage employment, families must be better off if they work than if they depend on welfare. By allowing eligible families to receive supplemental cash assistance in addition to a paycheck, Pennsylvania's TANF Program rewards work and helps families establish a financial base that will support self-sufficiency. The TANF Program also supports family efforts to work by providing allowances for work expenses, such as child care and transportation. 5. Break the Cycle of Dependence Through Education A high school diploma is critical to both short-term and long-term prospects for independence through employment. It opens the door to meaningful, productive employment. Training in a skill or trade, on-the-job training, job-search and job-readiness preparation classes and workshops, among other activities, provide a menu of opportunity for long-term self- sufficiency. Pennsylvania's Road to Economic Self-sufficiency through Employment and Training (RESET) Program encourages people to pursue education and training that is career specific as a means of, and in addition to, meeting work requirements. Additionally, it is important to educate parents regarding the role of high quality early learning experiences to help break the intergenerational cycle of poverty. Parents who work need to understand that the choices they make when placing their children in early care and education programs can influence their child's readiness for school and later success in life. 6. Strengthen Families and Support Children Both parents play a role in achieving self-sufficiency. The TANF Program requires parents to fulfill their fundamental responsibilities to their children through a strengthened child support enforcement system. 7. Simplify Program Administration Pennsylvania must be able to use resources productively -- to assist the client in developing and successfully implementing his or her own plan for self-sufficiency. As administrators of the public welfare system, we must have two goals: to help recipients of public assistance become self-sufficient and to ensure that tax dollars funding welfare programs are used wisely. IV. MEASURING RESULTS Monitoring implementation progress and evaluating attainment of program goals is an integral component of Pennsylvania's TANF Program. The primary focus of monitoring and evaluating activities is to gather data about a comprehensive set of performance indicators and performance measures which are used to document clear, specific program outcomes. The detailing of a definitive set of performance indicators and measures continues to evolve as program planning decisions are made and modified. The ongoing program evaluation information system includes such performance indicators and measures as the following: • Number and percentage of active adult TANF individuals who are employed. • Number and percentage of mandatory TANF adults participating in an employment/training/education activity. • Number and percentage of mandatory TANF adults not participating in an employment/training/education activity. • Number of TANF adults with a sanction, exemption or good cause. • Number of TANF adults in educational activities. • Number of TANF adults in independent or contracted training activities. • Number of TANF adults in job search activities. • Number of TANF adults in transition to a work activity scheduled, but not yet started. •

Number of TANF adults who are self-employed. • Number and percentage of job placements. • Job placement rate. • Cost per enrollment. • Cost per outcome. • Number and percentage meeting job retention. • Number of individuals obtaining jobs with benefits. • Number and percentage of TANF adults increasing hours of employment. • Number of TANF adults graduating from community college. • Number of TANF adults who receive child care subsidies that select high quality early care and education programs. A primary focus of program evaluation efforts associated with implementation of the TANF Program is to develop, maintain and refine, where necessary, an integrated and comprehensive evaluation information system which provides data and information on outcome and performance measures related to key components of TANF. This data is then used to provide ongoing monitoring assessments of program implementation and to provide summary statements describing attainment of program goals. To ensure the appropriate degree of program accountability, the measures used are defined by data and information which are timely, accurate, valid, reliable, credible and easily communicated. This information system is composed of TANF data and available data for pre-TANF assistance programs. The information system is supplemented by those data and information necessary to track the provisions of the TANF legislation and satisfy mandated reporting requirements. This collection of data about TANF participants, combined with data detailing critical program components, provides documentation of specific outcome and performance measures established for the TANF goals. Additionally, analyses of the data available in this information system combined with data from other sources provide important information about the configurations of participant and program characteristics which produce the most favorable long- term outcomes. Comparisons of these relationships between participant and program characteristics and their effects on outcome measures across time permit systematic, evolutionary, incremental shaping of TANF programs to effectively meet the TANF goals. With an increased awareness of the need to strengthen accountability, promote program integrity, and limit fraud, monitoring of Special Allowances (SPALs) issued to recipients in support of their RESET participation is necessary to assure that expenditures are verified, required, and used for their intended purpose. V. PUBLIC INVOLVEMENT A. Public Availability and Review A Notice of Availability of the Commonwealth of Pennsylvania's TANF State Plan was published in the Pennsylvania Bulletin on August 16, 2014, to allow for the public comment period. Copies of the TANF State Plan are available at the 67 County Assistance Offices (CAOs) around the state and on the Department of Human Services' (the Department) website (http://www.dhs.state.pa.us). The Pennsylvania Bulletin is the official gazette of the Commonwealth of Pennsylvania and is the temporary supplement to the Pennsylvania Code, the official codification of agency rules and regulations. The Notice published in the Bulletin indicated that comments on the TANF State Plan are to be directed to the Department of Human Services, Office of Income Maintenance. The State Plan was also submitted to key stakeholder groups for review and comment. These groups include members of the legislature and the Governor's Cabinet, as well as associations representing county government, client advocacy groups, business interests, and community agencies providing a variety of services to recipients of public assistance. B. Additional Outreach The Income Maintenance Advisory Committee (IMAC) received a briefing on the TANF State Plan. IMAC is composed of current and former welfare recipients, representatives of welfare rights organizations, employment and training specialists, and other client advocates. IMAC advises the Department on policies, procedures and other activities related to the programs administered by the Office of Income Maintenance. C. Public Comments The Department of Human Services accepted comments on the TANF State Plan from the general public. The Department's ongoing review of the TANF Program includes review and consideration of public comments along with the tracking of outcomes of the TANF Program. The Department will submit amendments to the State Plan on an as-needed basis. VI. OUTLINE OF PENNSYLVANIA'S TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) PROGRAM Although the TANF Program replaced the former federal cash benefits program known as Aid to Families with Dependent Children (AFDC), many of the rules and procedures under which the Department administered AFDC remain in effect as part of the TANF Program. These

rules and procedures are contained in Chapter 55 of the Pennsylvania Code of regulations (55 Pa. Code), Notices of Rule Change to the Code published in the Pennsylvania Bulletin, Office of Income Maintenance (OIM) Bulletins, OIM Operations Memoranda and Departmental Handbooks. Financial eligibility criteria for Maintenance of Effort (MOE) –funded assistance and services are the same as for other TANF assistance and services, except MOE claimed for child care under the provisions of 45 CFR §263.3 follows the financial eligibility criteria established under the Child Care and Development Fund State Plan and associated state regulations. New or revised rules and procedures are set forth in the State Plan. These changes and revisions are adopted pursuant to the authority of PRWORA, Pennsylvania's Act 35, §§201(2) and 403(b) of the Public Welfare Code (62 P.S. §§201(2) and 403(b)) and Act 1997-58 (P.L. 549, No. 58). Federal statute at 42 U.S.C.A. §609(a)(7)(B)(i) provides for the possibility of separate and segregated state programs. Stakeholders were consulted and input was solicited. The decision to create a segregated state program is incorporated and included in this State Plan. A. GENERAL PROVISIONS 1. Program Administration The Department is responsible for administering the TANF Program in 67 CAOs. While program requirements are applied consistently statewide, the maximum TANF benefit varies from county to county based on the four benefit schedules currently in effect. The Department continues to use private contractors to supplement the work of the CAOs to provide services, such as job search, job-readiness preparation, education and training services, and to assist clients to enter the work force, retain jobs and advance in employment. Individuals who receive TANF benefits on or after March 3, 1997, are subject to all requirements of the TANF Program. Recipients are subject to the 60-month lifetime limit and the work requirements of Act 35 beginning March 3, 1997. 2. Defining Assistance/Non-Assistance Benefits Assistance For purposes of applying TANF time limits, work and work activity requirements and child support cooperation (including assignment) requirements, the term "assistance" is defined as cash payments, vouchers and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses). "Assistance" also includes: • Supportive services such as transportation and TANF-funded child care provided to non- employed cash assistance recipients. If a benefit falls within the definition of assistance, the benefit counts as assistance even when receipt of the benefit is conditioned on participation in work, community service or other work- related activities. Financial eligibility for TANF, Time-Out and Extended TANF cash assistance is determined by comparing the net countable income for a calendar month to the budget group's Family Size Allowance (FSA), plus any special need allowances. If the income equals or exceeds the FSA plus any special needs allowances, the budget group is ineligible for cash assistance. Current FSA levels are found in 55 Pa. Code, Chapter 183, Income, Appendix B. Table 3. The resource limit is $1,000. Funding for TANF is commingled state and federal funds. Funding for Time-Out is segregated state funds and funding for Extended TANF is all federal monies. Non-Assistance The final Federal TANF Rules of April 12, 1999, include the potential for funding a class of benefits known as "non-assistance." Pennsylvania excludes from the definition of "assistance" activities that support employed former TANF recipients or those who are eligible for, but not receiving "assistance." For example, case management services, job retention programs, child care and wage subsidies may be provided as on-going supports to employed former cash assistance recipients. These services and benefits received by the family are considered "non-assistance," and the family receiving them after leaving cash assistance is no longer using months of time-limited TANF assistance. In Pennsylvania, the Department constantly reviews its programs to ensure they meet the needs of low-income families as envisioned in the four TANF purposes. The Department incorporated a total of seven non-assistance initiatives included in the FY 2014-2015 budget that provide short-term benefits, work supports and other services to eligible low-income families and non- custodial parents. Although these short-term benefits, work supports and services are funded with TANF funds, they are excluded from the definition of "assistance" in 45 CFR §260.31 and do not count towards the 60-month TANF time limit. In addition, individuals receiving these benefits are not subject to the TANF work requirement or to a federally-imposed child support

requirement. Pursuant to 45 CFR §260.31, the term “non- assistance” is defined below: • Non-Assistance includes: • Non-recurrent, short-term benefits that: - Are designed to deal with a specific crisis situation or episode of need; - Are not intended to meet recurrent or ongoing needs; and - Will not extend beyond four months. OR • Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training); OR • Supportive services such as child care and transportation provided to families who are employed; OR • Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement and other employment- related services that do not provide basic income support. In accordance with 45 CFR §260.31 and subject to the availability of resources, the Department intends to provide funding included in the FY 2014-2015 budget for the following non-assistance initiatives to certain needy families, based on the program descriptions and eligibility set forth in each initiative appearing below: • Diversion Component This initiative provides funds to certain eligible families to meet a specific crisis situation or episode of need that is intended to eliminate a family’s need for ongoing cash assistance. To be eligible for a diversion benefit the applicant family must meet income/resource requirements and definitive conditions (minor child, specified relative and deprivation) for receipt of TANF. The Diversion component provides a one-time non-assistance payment to eligible families. The adult in the family must have an expectation of receiving income and must have a recent work history or job skills training. A recent work history is defined as having worked within the 90-day period immediately preceding the date of application, or within 180 days of the date of application in areas qualified as waived areas for time limited SNAP benefits. The Diversion payment is equal to the Family Size Allowance (FSA) for one, two or a maximum of three months, depending upon a family’s need. A family will be eligible for only one payment in a 12-month period. Examples of a crisis situation or episode of need are: • The threat of homelessness, eviction, or utility shut off • Employment, school, or training related needs • Car repairs, inspections, payments, insurance premium payments and other transportation costs • Costs to relocate to secure employment • Child care costs This initiative meets TANF purpose number one, which is to provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives and number two, to end dependence of needy parents on government benefits by promoting job preparation, work, and marriage. This initiative is funded with 100% federal funds. Penalty for Non-cooperation with Child Support Requirements If a parent or other caretaker relative fails to cooperate in establishing paternity or in establishing, modifying or enforcing a child support order, without good cause in accordance with Act 58, state regulation provides that the cash assistance allowance, which is the monthly assistance grant, is reduced by 25%. The grant remains reduced until the parent or caretaker relative demonstrates cooperation or establishes good cause for noncooperation. Penalty for Conviction of Welfare Fraud An applicant or recipient who has been convicted of securing or attempting to secure, or aiding or abetting or attempting to aid or abet any individual in securing TANF, Medical Assistance or Federal SNAP by means of a willfully false statement or misrepresentation, or by impersonation, or by willfully failing to disclose a material fact regarding eligibility either before or at the time of, or subsequent to the application for assistance is ineligible for cash assistance. The period of ineligibility is 6 months from the date of the first conviction, 12 months from the date of the second conviction, and permanently from the date of the third conviction. To identify instances of potential fraud the Commonwealth of Pennsylvania uses the Income Eligibility Verification System (IEVS), the Systematic Alien Verification for Entitlements (SAVE) Program and the Master Client Index (MCI). IEVS provides information on: • Wages and unemployment compensation through the Pennsylvania Department of Labor and Industry. • Supplemental Security Income and other income through the Social Security Administration. • Both earned and unearned income through the Internal Revenue Service. • Deceased person matches through the Department of Health. • Simultaneous receipt of TANF benefits in multiple states through the Public Assistance Reporting Information System. • Criminal history information through the Commonwealth Judicial Inquiry System. Additionally, a data exchange for lottery winner’s match is available. The SAVE Program verifies citizenship, identity and immigration status for non-citizens.

MCI matches the TANF file with the Child Care Management Information System and the Home and Community-Based Information System to defer fraud by the elimination of duplicate services across programs. • Satisfaction of Criminal Penalties An individual who has been sentenced for a felony or misdemeanor offense and who has not satisfied the penalty imposed by the court is ineligible for TANF. An individual who is required to pay fines, cost and restitution, and who is in compliance with an approved payment plan, may be eligible for TANF. • Fraudulent Misrepresentation of Residence An individual is ineligible for TANF for a period of ten years if he is convicted in a federal or state court of fraudulent misrepresentation of residence for the purpose of receiving TANF, Medical Assistance, SNAP or Supplemental Security Income in two or more states simultaneously. • Penalty for Conviction of a Felony Offense for Possession, Use or Distribution of a Controlled Substance As permitted under federal law, Pennsylvania enacted legislation to opt out of the federal requirement that imposes permanent ineligibility on an individual who is convicted under Federal or state law of a felony offense that was committed after August 22, 1996, related to the possession, use or distribution of a controlled substance. Act 44 was signed into law on December 23, 2003. An individual may receive cash assistance, but he or she must agree to assessment/treatment if assessment/treatment is needed based on his or her statement, current participation in a treatment program or other substantial evidence that the Department may have. The individual must comply with assessment/treatment if the treatment is necessary, available and appropriate for benefits to continue, unless there is good cause for not doing so. • Failure To Appear At Criminal Court Proceeding An individual who, as a defendant, fails to appear at a criminal court proceeding when issued a summons or bench warrant is ineligible for TANF until he complies with the summons or bench warrant. • Fugitive Felon An individual who is fleeing to avoid prosecution or custody or confinement following a conviction for a felony or who is violating probation or parole imposed under Federal or State law is ineligible for cash assistance. If the individual receives a Presidential pardon for the conduct the individual is not ineligible as a fugitive felon or probation/parole violation, for any month beginning after the pardon. • Violation of Probation or Parole An individual who is in violation of the terms of probation or parole is ineligible for TANF until he or she complies. 5. Child Support Requirements Prerequisites to receiving TANF cash benefits include cooperation with the Department, the Domestic Relations Section of the County Court of Common Pleas or the County Court of Common Pleas in identifying a non-custodial parent, establishing paternity and establishing an order for support. Cooperation is required unless the applicant/recipient establishes good cause for not doing so. To be eligible for benefits, applicants or recipients are required to: • Furnish his or her Social Security number or provide proof an application has been filed to obtain a Social Security number. • Assign to the Department support rights for all family members who are receiving benefits by affixing their signature to an application for benefits. • Cooperate with the Department, Domestic Relations Section and the court in establishing paternity of a child, unless the applicant or recipient establishes good cause for failing to do so. • Cooperate in obtaining support payments for the applicant or recipient and for the child, unless the Department determines that the applicant or recipient has good cause for failing to do so. The Department may waive cooperation requirements for good cause. Good cause includes: • The child was conceived as a result of incest or rape. • Legal proceedings for the adoption of the child are pending before a court. • The applicant or recipient is currently being assisted by a public or licensed private social agency while the decision is being made whether to relinquish the child for adoption and the discussions have not progressed for more than three months. • Establishing paternity or obtaining child or spousal support increases the risk to the family of further domestic violence. The applicant or recipient of cash assistance shall provide relevant verification of good cause. Applicants must appear before, and obtain from, the Domestic Relations Section of the County Court of Common Pleas, a certification of cooperation with child support enforcement requirements prior to authorization of TANF benefits. The Secretary of the Department may waive the personal appearance requirement for a county court or Domestic Relations Section following review of a written request from the county which establishes that another procedure would be as efficient and effective. The applicant or recipient must cooperate and

take the following actions: • Identify the parent(s) of any child for whom assistance is sought or received. This includes an appearance by the applicant or recipient, with the child, for scheduled genetic testing. The failure of the mother to identify by name the father of a child creates a presumption of noncooperation which may be rebutted only by clear and convincing evidence. If an applicant or recipient provides the names of two putative fathers subsequently excluded from paternity by genetic testing, the second exclusion creates a presumption of noncooperation, which may be rebutted only by clear and convincing evidence. • Keep scheduled appointments with the Department or Domestic Relations Section. • Provide truthful and accurate information and documents requested by the Department or Domestic Relations Section. • Sign and return any forms requested by the Department or Domestic Relations Section. • Appear as a witness and provide testimony at judicial and other hearings as requested by the Domestic Relations Section. • Pay to the Department any support payment received directly from the non-custodial parent after an assignment of support has been made. The Department, the Domestic Relations Section of the Court of County Common Pleas or the County Court of Common Pleas may determine whether the applicant or recipient has failed to cooperate without good cause. In accordance with Title 23 of the Pennsylvania Consolidated Statutes (23 Pa.C.S.) §4374(c)(1), the State may retain the support collected on behalf of a family receiving TANF up to the amount of the cumulative assistance paid to the family. The State will distribute child support collected on behalf of families receiving TANF cash assistance as follows: • Effective October 1, 2008, from the amount of current support collected, pass through to the assistance group the first $100 per month for one child or the first $200 per month for two or more children, or the first $50 per month for spousal support, without decreasing the amount of cash assistance. In no case will an assistance group be paid more than one support pass through per month. The support pass through will be capped at $200 maximum per month. • Pay the federal government's share and retain the remainder of the amount collected to reimburse the Commonwealth until the amount equals the amount of unreimbursed cash assistance paid to the assistance group. • Pay to the assistance group receiving TANF any support collected in excess of the amounts distributed or retained as listed above. In accordance with 23 Pa.C.S.§4352(a.1), TANF child support orders must be reviewed and adjusted, as necessary, on a 3-year cycle absent of any specific request from the Department. Effective October 1, 2008, in accordance with 23 Pa.C.S. §4374(d), the state will pay support collected through the Federal Tax Refund Offset Program to families to whom current support or arrears is owed prior to retaining such collections to pay the federal or state shares of assigned support. Specifically: For a family receiving cash assistance, arrears collected through the Federal Tax Refund Offset Program shall be retained by the Commonwealth to the extent past due support has been assigned to the department as a condition of receiving assistance. For a family that formerly received cash assistance, arrears collected through the Federal Tax Refund Offset Program shall first be applied to the monthly support obligation, and the balance shall be applied to arrears owed the family, including assignments of arrearages that accrued before the family received assistance from the Commonwealth and that were executed between October 1, 1997 and September 30, 2009. Any remaining arrearages shall be paid to the department. In accordance with 23 Pa.C.S. §4378(b), the state limits the assignment of support rights only up to the amount of cash assistance received during the period that a family received assistance. Effective October 1, 2009, the assignment shall exclude arrears that accrued prior to receipt of assistance. 13. Coordination with Child Welfare Pennsylvania recognizes the need to strengthen the existing line of communication between the local CAOs and the local County Children and Youth Agencies (CCYAs). A workgroup developed a set of inter-agency protocols to coordinate efforts to serve mutual clients. The process eliminates development of conflicting service plans and eliminates the possibility of conflicting program requirements. The protocols require that the activities outlined on the AMR, prepared in the CAOs, should be coordinated with the Family Service Plan that is prepared at the CCYA. All 67 CAOs and CCYAs implemented county protocols to ensure a local service delivery system that enables families to reach self-sufficiency while providing a safe environment for the child. Additionally, prior to the imposition of a sanction for non-

compliance with the work requirement, CAOs are required to contact CCYAs to determine if a family may have good cause for such non-compliance. 15. Transfers of TANF Block Grant Funds Pennsylvania continues to provide supportive and emergency services through TANF or other State programs as follows: • Pennsylvania allocates TANF Youth Development Funds (YDF) from the TANF Block Grant to the Department of Labor & Industry. These funds are used for youth workforce development programs that include the following activities: - After School Programs consisting of homework assistance, developing work skills, entrepreneurial activities, time management, career exploration, leadership training and mentoring programs. - In-school career awareness focusing on Science, Technology, Engineering and Math (STEM) careers. - Out-of-school youth programs focusing on internships and work experience. - Activities for youth who are co-enrolled in Workforce Investment Act of 1998 (WIA), Title I Youth. These activities meet the WIA Youth performances measures of: Placement in Employment or Education, Attainment of Degree of Certificate and Literacy and Numeracy Gains. Eligibility for these programs is limited to TANF recipients or members of a household with income less than 235% of the federal poverty income guideline (FPIG) level. This initiative is funded with 100% federal funds and leveraged with WIA funds. This initiative meets TANF purpose number two – end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage. • Pennsylvania reserves the option to transfer TANF funds to the Child Care and Social Services Block Grants. 18. Identifying Domestic Violence Pennsylvania exercised the federal TANF option to certify that it will screen for and identify victims of domestic violence. Since 1997, the Department has collaborated with the Pennsylvania Coalition Against Domestic Violence (PCADV), its statewide contractor providing services to victims of this abuse, to develop a program to screen for and identify domestic violence victims among TANF applicants and recipients. This collaboration has taken place under the auspices of the Domestic Violence/TANF Task Force. The Task Force developed a training program (including a video role play) that provides information on identifying and understanding victims of domestic violence as well as guidance on how a caseworker should use this information to perform his/her job. Victims of domestic violence may qualify for temporary waivers of TANF program requirements such as time limits on receipt of cash assistance, employment and training requirements and child support cooperation requirements. To avoid asking each individual specific questions on domestic violence, the Task Force developed several forms of universal notification. Brochures and palm cards that explain domestic violence and contain the telephone numbers of local domestic violence agencies are available for distribution in the CAOs. These items may be dispensed by the caseworker or placed in areas of the CAO such as the women's restroom for discreet access. Two different domestic violence awareness posters are also available for posting in the CAOs. In addition, the Common Application Form includes a tear-out sheet explaining domestic violence, good cause and the possibility of being temporarily excused from certain program requirements. The Department has also revised its regulations governing good cause for failing to cooperate with child support requirements based on a claim of domestic violence. Applicants/recipients who are unable to safely provide documentation of good cause within the established time frames for providing verification may sign an affirmation of this fact and be granted good cause. 19. Link with Medical Assistance TANF eliminated the automatic granting of Medical Assistance benefits to cash assistance recipients. However, it provided states the opportunity to maintain the link by ensuring that their TANF design is no less restrictive in certain financial and non-financial criteria. Since Pennsylvania's TANF Program does ensure this, TANF cash recipients continue to receive Medical Assistance benefits. Pennsylvania implemented several operational changes to ensure that individuals transitioning from TANF receive all Medical Assistance benefits for which they are eligible. The Department instructed caseworkers to: 1) determine Medical Assistance eligibility when closing a cash case; 2) authorize Transitional Medical Assistance (TMA) as appropriate; 3) issue a notice of Medical Assistance eligibility when closing a cash case; and 4) determine Medical Assistance eligibility when rejecting a cash application. Also, computer enhancements were developed to: 1) have the system automatically review individuals for Medical Assistance when rejecting or closing a

cash case; and 2) automatically open cases for TMA based on specific closing codes. Due to new requirements under the Affordable Care Act, MA coverage under TMA is limited to 4 months. These enhancements are supported by supervisory reviews and management monitoring of every cash case closing when an immediate opening of Medical Assistance does not occur. The Department worked with the Pennsylvania Insurance Department (PID) to maintain a joint application for the federally-funded Children's Health Insurance Program (CHIP) and will continue to do so now that CHIP is administered by the Department. COMPASS is an online application for Pennsylvanians to apply for health and human services benefits. COMPASS automatically routes an application to the appropriate agency. Individuals can apply, renew and check the status of their application through COMPASS. An individual who receives benefits can establish a "My COMPASS Account" which allows them to view their benefits and report changes. Pennsylvania implemented an electronic referral process between CHIP and Medical Assistance, known as the "Health Care Handshake". This process ensures that a child's application for health care coverage submitted to CHIP and who qualifies for Medical Assistance is referred to the Department. Pennsylvania engages in outreach efforts to support policy directives and initiatives. The Healthy Babies/Healthy Kids Hotline is available as an outreach resource. The hotline is also a referral and informational source for CHIP and Medical Assistance program. Pennsylvania continues its commitment to provide families with the Medical Assistance coverage to which they are eligible. 20. Supplemental Nutrition Assistance Program (SNAP) Outreach Pennsylvania has joined with the United States Department of Agriculture Food and Nutrition Service (FNS) to provide funds, 50% from FNS and 50% from Pennsylvania, to 14 community- and faith-based organizations for SNAP outreach. This project is known as Supplemental Nutrition Assistance Program Participation Project (SNAP PP). The organizations complete and submit SNAP applications on behalf of clients to the County Assistance Office and provide information about the SNAP Program. A focus of this program is to introduce potentially eligible applicants to the on-line COMPASS application process. Through this on-line tool, individuals who receive SNAP benefits can reapply on-line from the convenience of their homes, thereby making the SNAP that much more accessible. Another outreach program, the Pennsylvania Supplemental Nutrition Assistance Program Education (SNAP-Ed) also referred to as PA TRACKS, provides nutrition education to low-income individuals and families who are eligible to receive SNAP benefits. The program aims to foster positive behavioral changes related to nutrition and physical activity. There are 19 TRACKS partners that deliver SNAP-Ed throughout Pennsylvania. B. SPECIAL PROVISIONS 1. Time-Out Initiative The Department incorporated a segregated state-funded program in the Fiscal Year (FY) 2001-2002 budget, known as the Time-Out Initiative. This initiative provides incentives to families who are addressing barriers to self-sufficiency where an individual has been identified as a victim of domestic violence and kinship caregivers. By segregating state funds from federal Temporary Assistance for Needy Families (TANF) funds, individuals who otherwise qualify for TANF may receive cash assistance under the segregated state-funded program that does not count towards the 60-month lifetime limit (42 U.S.C.A. §609(a)(7)(B)(1)). In accordance with 42 U.S.C.A. §609(a)(7)(B)(1) and subject to the availability of resources, the Department intends to provide funding included in the FY 2014-2015 budget for the Time-Out Initiative. Eligibility for participation in the Time-Out initiative is limited to those families who meet the income, resource, and non-financial eligibility factors associated with the TANF program. Domestic Violence Victims of domestic violence may be eligible for up to 12 months of Time-Out in a life time. These individuals may receive benefits in the Time-Out program for six months with an additional six months, if the need still exists. The limit on the number of months an individual may receive Time-Out applies regardless of whether the months are consecutive. Kinship Caregiver • A non-parental caretaker who has received 24 months or more of cash assistance for himself/herself and a related minor dependent child, or has care and control of a related minor dependent child as a result of court-ordered placement by Children and Youth Services; and • Is not receiving cash assistance for children of his/her own; and • Is meeting the minimum 20-hour weekly work requirement, is exempt or has good cause for not meeting work requirements. This initiative meets

TANF purpose number one – provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, and TANF purpose number two – end dependence of needy parents on government benefits by promoting job preparation, work and marriage. 2. Extended TANF Cash Assistance Pennsylvania's provision for receipt of TANF assistance beyond the 60-month federal time limit is known as Extended TANF. Regulations at 42 U.S.C.A. §608(a)(7)(C) and 45 CFR §264.1(c) give states the option to extend TANF beyond the 60-month limit to families that have a hardship as defined by the state or include an individual who has been battered or subjected to extreme cruelty (domestic violence). The number of families that may receive Extended TANF is limited to 20% of the average monthly number of families receiving TANF during the current or preceding fiscal year. Pennsylvania is exercising this option. The Extended TANF program was implemented on October 28, 2002. TANF families who exhaust the 60-month time limit or who were granted Extended TANF during the contingency period are permitted to apply for Extended TANF cash assistance and meet eligibility requirements, as defined below. Among those who may qualify for Extended TANF are: • Recipients who are exempt or have good cause for not meeting the work requirements; • Recipients who are required and meeting the work requirements; and •????Recipients who are victims of domestic violence. Families who exhaust the TANF time limit and have their cash assistance discontinued may apply for and receive Extended TANF at a future time, if they are otherwise eligible. Funding for Extended TANF is all Federal monies. 3. Transitional Cash Assistance In accordance with 42 U.S.C.A. §609(a)(7)(B)(i) and subject to the availability of resources, the Department intends to provide funding included in the FY 2014-2015 budget for the Transitional Cash Assistance grant Benefits received for this temporary supplemental grant will not extend beyond a three- month period. Effective March 28, 2009, certain families who are ineligible for continued assistance in the TANF, Extended TANF or Time-Out programs due to earned income may be eligible for a temporary supplemental grant, known as Transitional Cash Assistance (TCA). The purpose of TCA is to support families as they transition from dependence on welfare to self-sufficiency. Eligibility for this supplemental grant is limited to needy families, as defined in this State Plan, who have a gross annual earned income that does not exceed 235% of the FPIGs. Eligibility rules are as follows: • Families receiving assistance must become ineligible for assistance due to excess earned income. • Families must meet the federal Work Participation Rate at the time they no longer qualify for assistance. • Families will receive $100 per month (two semi-monthly $50 issuances) for three consecutive months. • Assistance received during this period does not count against the 60-month lifetime limit on TANF. This program is funded with 100 percent State Maintenance of Effort (MOE) funds. This grant meets TANF purpose number two, to end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage. 8. Community Service Option Pennsylvania has opted out of the provision to require a parent or caretaker to participate in community service if that parent or caretaker has received assistance for two months, is not exempt from work participation, and is not engaged in work. VII. OFFICE OF CHILDREN, YOUTH AND FAMILIES AMENDMENT A. Other State Programs and Services Designed to Meet the Purposes of TANF 1. General Relationship to TANF Purposes TANF provides states the flexibility to develop and implement innovative approaches to address TANF purposes. Therefore, effective October 1, 1999, the Department, through the Office of Children, Youth and Families (OCYF), county children and youth agencies (CCYAs) and juvenile probation offices (JPOs) has operated a segregated TANF federally- funded program. The segregated TANF Federally-funded program is reasonably related to the TANF goals of providing assistance to needy families so that children may be cared for in their own homes or in the homes of relatives, preventing and reducing the incidence of out-of-wedlock pregnancies, and encouraging the formation and maintenance of two-parent families. These goals will be promoted through the provision of services described under sections 2 and 3 below. Services are also provided in any manner that Pennsylvania was authorized to use funds received under Title IV-A or Title IV-F of the Social Security Act, as such titles were in effect on September 30, 1995, including as specified in section 3 below. 2. Family Preservation, Reunification and Support Services

Designed to Promote TANF Purposes The services listed in this section are provided as non-assistance services to needy families. The services listed in this section are reasonably related to the goals of assisting needy families so that children may be cared for in their own homes or homes of relatives including children placed in the homes of relatives, encouraging the formation and maintenance of two-parent families and preventing and reducing the incidence of out-of- wedlock pregnancies, i.e., TANF purposes 1, 3 and 4. These services are intended to break the cycle of social, emotional and economic dependency by providing the necessary interventions, supports and services to families experiencing various forms of crises and dysfunction, e.g., substance disorder, lack of parenting skills, marital/relationship problems. The provision of services identified in this section will enable families and children to develop the skills and supports necessary to overcome their problems in functioning, thereby providing them with a stable foundation upon which additional competencies related to permanent and stable relationships and responsible parenting can be built. Stable relationships and responsible parenting skills are essential for creating an environment in which two-parent families can continue to exist or come into existence. The existence of stable relationships and responsible parenting skills is also essential to breaking the cycle of out-of-wedlock pregnancies. The following family preservation, reunification and support services are provided or arranged for families and for children residing in their homes (and for children who are temporarily in foster care and who are expected to return to the home within the temporary absence period established by the State) by OCYF, CCYAs or JPOs, as determined necessary and appropriate. The services are provided as non-assistance services to assist needy families. For purposes of this section, “needy” is defined as having a household income of less than 400% of the Federal poverty level. • Parent/Child Visitation • Intensive Family Preservation Services • Casework/Case Management Services • Diagnostic and Assessment Services • Family Support Services including Respite Care • Family Centers – collaborative community efforts to provide a range of services to children and their families at a single location. Centers that provide child welfare TANF services described in the plan provide those services to eligible children to promote keeping families together and to maintain children in their own homes. Child welfare TANF funds are directed to specific children served by the family centers and are not used to support the center’s administration. • Counseling Services • Parenting and Home Management Services • Independent Living Services • Preventive Services focused on promoting family stability and responsible behavior of individuals and reducing economic dependence • Delinquency Prevention/Remediation Services • Day Treatment and Protective Child Care Services • Non-Medical Substance Disorder Services • Other In-home Services • Programs Promoting Responsible Fatherhood • Adoption Services 3. Services Provided to Dependent and Delinquent Children Who Have Been Placed into Residential Care As authorized in the approved Title IV-A State Plan in effect as of September 30, 1995, TANF funds may be used to pay for non-Title IV-E eligible emergency shelter services, not to exceed 30 consecutive days and in accordance with 55 Pa. Code §§3130.37 and 3140.22(c) and the purchases of services provided to children temporarily placed in residential care provided that the services are not part of the per diem and are billed services. Eligible services include: • Child Protective Services/Child Abuse • Child Care Services • Day Treatment Services • Child Protective Services-General • Information and Referral Services • Service Planning • Counseling/Intervention Services • Homemaker/Caretaker Services • Life Skills Education The cost for placement in a Juvenile Detention Facility can no longer be claimed under TANF. FUNDING Section 403(a)(1)(A) provides that each eligible State shall be entitled to receive for each of the fiscal years 1996 through 2010, a grant in an amount equal to the State family assistance grant as defined in section 403(a)(1)(B). I. Payments to Agency Administering the TANF Program. Please provide payment for the TANF Program to the same organization administering the TANF Program as of March 3, 1997. II. State Payments for TANF Program Payments for the TANF Program are to be made to the Pennsylvania Department of Human Services. The Commonwealth of Pennsylvania’s estimate for each quarter of the fiscal year by percentage is: For FY 2015 and Future Years 1st Quarter 25% 2nd Quarter 25% 3rd Quarter 25% 4th Quarter 25%

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act) Yes

Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under The Unified or Combined State Plan under title XIX. (section 402(a)(3) of the Social Security Act) Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; Yes

Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—have had at least 45 days to submit comments on the plan and the design of such services Yes

Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act) Yes

Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act) Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).— refer such individuals to counseling and supportive services; Yes

(optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence Yes

EMPLOYMENT AND TRAINING PROGRAMS UNDER THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (PROGRAMS AUTHORIZED UNDER SECTION 6(D)(4) OF THE FOOD AND NUTRITION ACT OF 2008 (7 U.S.C. 2015(D)(4)))

A. GENERAL REQUIREMENTS

The State agency must prepare and submit an Employment and Training (E&T) Plan to its appropriate Food and Nutrition Service (FNS) Regional Office. The E&T Plan must be available for public inspection at the State agency headquarters. A State agency may include its plan for the SNAP E&T program in a Combined Plan under WIOA but will require FNS approval prior to implementation and must continue to make a copy of the plan available for public inspection. If a State includes SNAP E&T in a Combined Plan under WIOA, the State agency will detail the following for each year covered by the Combined Plan:

1. THE NATURE OF THE E&T COMPONENTS THE STATE AGENCY PLANS TO OFFER AND THE REASONS FOR SUCH COMPONENTS, INCLUDING COST INFORMATION. THE METHODOLOGY FOR STATE AGENCY REIMBURSEMENT FOR EDUCATION COMPONENTS MUST BE SPECIFICALLY ADDRESSED;

2. AN OPERATING BUDGET FOR THE FEDERAL FISCAL YEAR WITH AN ESTIMATE OF THE COST OF OPERATION FOR EACH FEDERAL FISCAL YEAR COVERED BY THE COMBINED PLAN. ANY STATE AGENCY THAT REQUESTS 50 PERCENT FEDERAL REIMBURSEMENT FOR STATE AGENCY E&T ADMINISTRATIVE COSTS, OTHER THAN FOR PARTICIPANT REIMBURSEMENTS, MUST INCLUDE IN ITS PLAN, OR AMENDMENTS TO ITS PLAN, AN ITEMIZED LIST OF ALL ACTIVITIES AND COSTS FOR WHICH THOSE FEDERAL FUNDS WILL BE CLAIMED, INCLUDING THE COSTS FOR CASE MANAGEMENT AND CASEWORK TO FACILITATE THE TRANSITION FROM ECONOMIC DEPENDENCY TO SELF-SUFFICIENCY THROUGH WORK. COSTS IN EXCESS OF THE FEDERAL GRANT WILL BE ALLOWED ONLY WITH THE PRIOR APPROVAL OF FNS AND MUST BE ADEQUATELY DOCUMENTED TO ASSURE THAT THEY ARE NECESSARY, REASONABLE AND PROPERLY ALLOCATED. A STATE MUST SUBMIT A PLAN AMENDMENT TO REQUEST BUDGET ADJUSTMENTS AT LEAST 30 DAYS PRIOR TO PLANNED IMPLEMENTATION;

3. THE CATEGORIES AND TYPES OF INDIVIDUALS THE STATE AGENCY INTENDS TO EXEMPT FROM E&T PARTICIPATION, THE ESTIMATED PERCENTAGE OF WORK REGISTRANTS THE STATE AGENCY PLANS TO EXEMPT, AND THE FREQUENCY WITH WHICH THE STATE AGENCY PLANS TO REEVALUATE THE VALIDITY OF ITS EXEMPTIONS;

4. THE CHARACTERISTICS OF THE POPULATION THE STATE AGENCY INTENDS TO PLACE IN E&T;

5. THE ESTIMATED NUMBER OF VOLUNTEERS THE STATE AGENCY EXPECTS TO PLACE IN E&T;

6. THE GEOGRAPHIC AREAS COVERED AND NOT COVERED BY THE E&T PLAN AND WHY, AND THE TYPE AND LOCATION OF SERVICES TO BE OFFERED

7. THE METHOD THE STATE AGENCY USES TO COUNT ALL WORK REGISTRANTS AS OF THE FIRST DAY OF THE NEW FISCAL YEAR;

8. THE METHOD THE STATE AGENCY USES TO REPORT WORK REGISTRANT INFORMATION ON THE QUARTERLY FORM FNS–583

9. THE METHOD THE STATE AGENCY USES TO PREVENT WORK REGISTRANTS FROM BEING COUNTED TWICE WITHIN A FEDERAL FISCAL YEAR. IF THE STATE AGENCY UNIVERSALLY WORK REGISTERS ALL SNAP APPLICANTS, THIS METHOD MUST SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE EXEMPT FROM WORK REGISTRATION UNDER 7 C.F.R. §273.7(B)(1). IF THE STATE

AGENCY WORK REGISTERS NONEXEMPT PARTICIPANTS WHENEVER A NEW APPLICATION IS SUBMITTED, THIS METHOD MUST ALSO SPECIFY HOW THE STATE AGENCY EXCLUDES THOSE PARTICIPANTS WHO MAY HAVE ALREADY BEEN REGISTERED WITHIN THE PAST 12 MONTHS AS SPECIFIED UNDER 7 C.F.R. §273.7(A)(1)(I);

10. THE ORGANIZATIONAL RELATIONSHIP BETWEEN THE UNITS RESPONSIBLE FOR CERTIFICATION AND THE UNITS OPERATING THE E&T COMPONENTS, INCLUDING UNITS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. FNS IS SPECIFICALLY CONCERNED THAT THE LINES OF COMMUNICATION BE EFFICIENT AND THAT NONCOMPLIANCE BY THE PARTICIPANT BE REPORTED TO THE CERTIFICATION UNIT WITHIN 10 WORKING DAYS AFTER THE NONCOMPLIANCE OCCURS;

11. THE RELATIONSHIP BETWEEN THE STATE AGENCY AND OTHER ORGANIZATIONS IT PLANS TO COORDINATE WITH FOR THE PROVISION OF SERVICES, INCLUDING ORGANIZATIONS IN THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM, IF AVAILABLE. COPIES OF CONTRACTS MUST BE AVAILABLE FOR INSPECTION;

12. THE AVAILABILITY, IF APPROPRIATE, OF E&T PROGRAMS FOR INDIANS LIVING ON RESERVATIONS AFTER THE STATE AGENCY HAS CONSULTED IN GOOD FAITH WITH APPROPRIATE TRIBAL ORGANIZATIONS;

13. IF A CONCILIATION PROCESS IS PLANNED, THE PROCEDURES THAT WILL BE USED WHEN AN INDIVIDUAL FAILS TO COMPLY WITH AN E&T PROGRAM REQUIREMENT. INCLUDE THE LENGTH OF THE CONCILIATION PERIOD

14. THE PAYMENT RATES FOR CHILD CARE ESTABLISHED IN ACCORDANCE WITH THE CHILD CARE AND DEVELOPMENT BLOCK GRANT PROVISIONS OF 45 CFR 98.43, AND BASED ON LOCAL MARKET RATE SURVEYS.

15. THE COMBINED (FEDERAL/STATE) STATE AGENCY REIMBURSEMENT RATE FOR TRANSPORTATION COSTS AND OTHER EXPENSES REASONABLY NECESSARY AND DIRECTLY RELATED TO PARTICIPATION INCURRED BY E&T PARTICIPANTS. IF THE STATE AGENCY PROPOSES TO PROVIDE DIFFERENT REIMBURSEMENT AMOUNTS TO ACCOUNT FOR VARYING LEVELS OF EXPENSES, FOR INSTANCE FOR GREATER OR LESSER COSTS OF TRANSPORTATION IN DIFFERENT AREAS OF THE STATE, IT MUST INCLUDE THEM HERE.

16. INFORMATION ABOUT EXPENSES THE STATE AGENCY PROPOSES TO REIMBURSE. FNS MUST BE AFFORDED THE OPPORTUNITY TO REVIEW AND COMMENT ON THE PROPOSED REIMBURSEMENTS BEFORE THEY ARE IMPLEMENTED.

(B) ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD)

A State agency interested in receiving additional funding for serving able-bodied adults without dependents (ABAWDs)* subject to the 3-month time limit, in accordance with 7 C.F.R. §273.7(d)(3), must include the following for each Federal fiscal year covered by the Combined Plan under WIOA: *7 CFR § 273.7(c)(7)

1. ITS PLEDGE TO OFFER A QUALIFYING ACTIVITY TO ALL AT-RISK ABAWD APPLICANTS AND RECIPIENTS

Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;

2. ESTIMATED COSTS OF FULFILLING ITS PLEDGE

3. A DESCRIPTION OF MANAGEMENT CONTROLS IN PLACE TO MEET PLEDGE REQUIREMENTS

4. A DISCUSSION OF ITS CAPACITY AND ABILITY TO SERVE AT-RISK ABAWDS.

5. INFORMATION ABOUT THE SIZE AND SPECIAL NEEDS OF ITS ABAWD POPULATION

6. INFORMATION ABOUT THE EDUCATION, TRAINING, AND WORKFARE COMPONENTS IT WILL OFFER TO MEET THE ABAWD WORK REQUIREMENT.

(C) PLAN MODIFICATION

If FNS determines that the performance of a State agency with respect to employment and training outcomes is inadequate, FNS may require the State agency to make modifications to the State E&T plan to improve the outcomes.*

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*7 U.S.C. 2025(h)(5)(E) as amended by Agricultural Act of 2014 .

FUNDING DISCLAIMER

Funds may not be available when SNAP E&T portions of a Combined State Plan under WIOA are approved. FNS's obligation after approving a SNAP E&T plan submitted as part of a Combined State Plan is contingent upon the availability of an appropriation from which payment can be made. Any FNS funding resulting from an approval of a SNAP E&T plan submitted as part of a Combined State Plan is subject to FNS receiving sufficient funds (in the Program Financial Control System for FNS) to fund this and all prior approved SNAP E&T plans submitted as part of a Combined State Plan in their entirety in the time and date order received. Federal reimbursement to States for 50 percent of State administrative expenditures and for participant reimbursements is subject to the above conditions.

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Trade Adjustment Assistance Coordination with Other Programs The commonwealth uses Wagner–Peyser resources for career services and couples those resources with Title I and Trade resources to provide greater choice and focused resources where dislocated workers most need them. Dislocated workers receive all WIOA career services in a comprehensive PA CareerLink® center.

Pennsylvania co–enrolls all Trade–impacted workers in the WIOA program to ensure that all participants receive the full range of assistance available to dislocated workers. Workforce Investment Information Notice (WIIN) No. 14–02 and the Trade Act of 2002 with the Workforce Investment Act provide the commonwealth's policy on integrating services for Trade participants.

The commonwealth implemented an online application for TAA training, job search and relocation allowances, and the Alternative Trade Adjustment Assistance (ATAA) and Reemployment Trade Adjustment Assistance (RTAA) programs. This CWDS module is accessed via the Internet and dislocated workers, PA CareerLink® staff and training providers add information online. PA CareerLink® staff assists Trade–impacted workers with their applications, and assess the workers' skills and experiences.

Use of Funding The commonwealth will continue to position state merit staff at the local PA CareerLink® centers throughout the state to ensure that eligible Trade participants receive case management services in a timely manner. Funding will continue to be used for system upgrades to CWDS that will allow an integration of services offered by partner agencies. The IEP will also be enhanced to conform to WIOA dual enrollment requirements and avoid duplication of services during the case management process.

Benefit and Service Approvals by Merit Staff All Trade eligible workers are encouraged to participate in the reemployment services offered through PA CareerLink® offices prior to layoff during their Benefits Rights Interview (BRI). Merit staff are assigned as case managers to assist trade eligible participants through the case management process with a goal of enrolling participants in a Trade approved activity. Merit Staff work closely with WIOA partners to comply with the dual enrollment process. Requests for TAA benefits and services are made by merit staff at the PA CareerLink® centers on behalf of Trade participants via CWDS. Determinations for Trade benefits and services are issued by merit staff located in central office.

Has the state incorporated TAA into the sections indicated above? Yes

JOBS FOR VETERANS' STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(A) HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

Veterans and eligible persons will receive employment, training, and job placement services at the PA CareerLink® centers like other PA CareerLink® customers. However, veterans and eligible persons will receive priority of service, i.e., they will receive priority over non-veterans and other eligible persons when it comes to receiving employment, training, and job placement services.

All individuals, including veterans, who enter the PA CareerLink® first see an intake person. This person conducts an assessment and determines if the veterans and other eligible persons qualify to see the Disabled Veterans Outreach Program (DVOP) Specialist. The DVOP assists veterans with significant barriers to employment such a long-term unemployment, previous incarceration, and low-income status. If the veteran lacks a significant barrier to employment and does not otherwise qualify to see the DVOP Specialist, then the veteran will immediately be sent to the first staff member, other than the Local Veterans Employment Representative (LVER), for assistance. DVOP Specialists also may see veterans age 18 to 24 and transitional service members.

(B) THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

DVOP Specialists provide intensive services to veterans with disabilities, other eligible veterans, and other eligible persons as defined by 38 U.S.C. § 4103A; Veterans' Program Letter (VPL) No. 03-14; VPL No. 03-14, Change 1; VPL No. 03-14, Change 2; VPL No. 04-14; and VPL No. 08-14. The DVOP Specialists provide and facilitate a full range of employment, training, and placement services furnished to veterans who possess significant barriers to employment.

DVOP Specialists evaluate veterans' needs, knowledge, skills, and abilities; provide career guidance through vocational guidance or referrals to counseling; aid veterans in developing and documenting an individualized employment plan (IEP); and periodically review and update the IEP during the active case management process. DVOP specialists coordinate supportive services with applicable

providers, deliver technical assistance to community-based organizations for employment and training services to veterans, and assist PA CareerLink® partners in providing services to veterans on a priority basis.

LVERs conduct face-to-face contact with employers, plan and participate in job and career fairs, and conduct job development with employers. LVERs facilitate employment, training, and placement services furnished to veterans, promote the benefits of employing veterans, and facilitate employer training. LVERs work with other partners and workforce development providers to communicate employer outreach and job openings.

LVERs facilitate the provision of services to veterans by working with employers to ascertain the jobs that employers need to fill. LVERs share this information with the PA CareerLink® center. Other PA CareerLink® staff members, in turn, make veterans aware of employment opportunities. LVERs also facilitate the provision of services to veterans by providing employers with resumes and information about veterans who seek employment. In this manner, employers have a pool of job candidates for existing and future vacancies. LVERs play an important role in educating all PA CareerLink® partner staff with current employment initiatives and programs for veterans.

(C) THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR ONE-STOP DELIVERY SYSTEM PARTNER NETWORK;

Service delivery occurs through a seamless integrated delivery system called PA CareerLink®. Cross-trained, responsive customer service teams conveniently located in Pennsylvania communities provide effective services. Veterans receive priority in all employment and training programs. Priority of service is the responsibility of all PA CareerLink® staff and partner staff.

DVOP Specialists work with PA CareerLink® partners on a common strategy for identifying veterans who self-register by having the PA CareerLink® managers pull a list of veterans who self-identify. The PA CareerLink® manager invites the self-identified veteran to come to the PA CareerLink® center for services. Veterans who possess a significant barrier to employment receive a referral to the DVOP Specialist. This allows DVOP Specialists to supplement the work that already occurs at the PA CareerLink® center. A needs-based approach consists of screening for disadvantaged veterans, veterans who possess significant barriers to employment, and veterans most in need of intensive labor exchange services. PA CareerLink® centers conduct staff meetings, training sessions, and workshops on a periodic basis to keep all partners apprised of program updates, changes, revisions, accomplishments, and recommendations.

LVERs work with the PA CareerLink® Business Service Team in promoting veterans to employers. LVERs are key members of Business Service Teams as they provide information on current employer job openings, assist employers looking to hire veterans, and actively promote job-ready veterans to employers.

(D) THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Pennsylvania does not participate in the incentive award program.

(E) THE POPULATIONS OF VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

Pennsylvania serves all veterans. Every PA CareerLink® staff member and partner staff member assists veterans. DVOP Specialists, however, only serve a subset of all veterans. DVOP Specialists assist special disabled veterans, other veterans with disabilities, veterans with significant barriers to employment, veterans age 18 to 24, and transitional service members. LVERs indirectly serve veterans by principally working with employers.

Pennsylvania lacks federal or state recognized Native American tribes or reservations within its borders. However, several tribes are listed as organizations. Additionally, many Native American community centers exist throughout Pennsylvania. State workforce reports indicate that as of the last four cumulative quarters ending March 31, 2014, there exists 7,708 Native Americans, Alaskan natives, or Native Hawaiians reported as having received services, compared to a total of 593,825 participants served. These targeted populations represent 1.3 percent of total participants served. Unfortunately, Pennsylvania lacks a method of capturing the number of Native American veterans, other than compiled ad hoc reports, as that information is not available in federal reporting systems. However, it is correct to presume that a significant number of Native Americans are veterans. The commonwealth plans to coordinate with Native American organizations within Pennsylvania. This includes inviting Native Americans to participate in job fairs, furnishing them marketing materials, and advising them of available training opportunities. Pennsylvania assures that it will work with any Native American organizations in its efforts to assist Native American veterans who need services.

(F) HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

Every PA CareerLink® center covers priority of service regulations and requirements during staff meetings. These meetings include both partner staff and merit staff. Each PA CareerLink® center displays numerous posters and signage announcing priority of service. When job seekers enter a PA CareerLink® center, the receptionist asks job seekers if they are a veteran or the eligible spouse of a veteran. If an affirmative answer is provided, then the veteran or eligible spouse receives a registration form that differs in color form the non-veteran. The veteran or eligible spouse also receives a handout describing priority of service. The veteran or eligible spouse gets referred to the next available staff member for an assessment. If the assessment determines that the veteran possesses a significant barrier to employment, then the veteran is immediately referred to a DVOP Specialist. If the PA CareerLink® center lacks a DVOP Specialist, or the DVOP Specialist is unavailable, then the veteran goes to the next available staff member. The staff member cannot be a LVER. Veterans and eligible spouses receive priority of service in all functions and entities at the PA CareerLink® center. Once a PA CareerLink® staff member determines that a veteran meets the criteria for a specific program, the veteran is automatically afforded priority of service. VA Vocational Rehabilitation and Employment (VR&E) Chapter 31 participants receive referrals to the nearest DVOP Specialist within 48 hours after receiving notification from the VA VR&E office. If there is no DVOP Specialist within a reasonable commute, the veteran sees the closest PA CareerLink® Program Manager for an assessment and case management.

Priority of service to veterans and eligible persons remains the responsibility of all PA CareerLink® staff members, not simply DVOP Specialists. As part of Pennsylvania's monitoring process, each PA CareerLink® center submits a Quarterly Manager's Report on Services to Veterans that requires the PA CareerLink® center to explain its priority of service policy. Central office staff members review these reports for statewide consistency. Also, Pennsylvania plans to monitor 25 percent of the PA CareerLink® centers each year for compliance with the priority of service requirement. In addition, central office staff plans to accompany the USDOL VETS staff during the mandated annual JVSG audits.

The veterans' registrations will be reviewed to determine the types of services provided. Also, records will be reviewed to ensure that proper veterans program eligibility, e.g., veterans with a campaign badge have been correctly added to the records. Since the covered persons identifiers will be added automatically to records based on the self-identification in the virtual system, PA CareerLink® centers will check the registration services page to help guide priority of service. Reviewing the service record page allows PA CareerLink® staff members to look for indicators that may suggest a need for case management, intensive services, job search assistance, skills training, or further guidance. In addition, job orders will be evaluated to determine if veterans received priority of service. Job orders will be reviewed to ascertain if job-matched veterans received referrals, and a determination will be made if a referral did not occur.

(G) HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND ONE-STOP DELIVERY SYSTEM PARTNER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

All PA CareerLink® DVOP Specialists and one–stop delivery system staff provide job and job training individualized career services as well as job–driven training and subsequent placement services through referrals to PA CareerLink® partner entities. The DVOP Specialist or PA CareerLink® staff member and the participant mutually decide upon the individualized career services that the participant will receive during meetings and case management sessions. The commonwealth will utilize CWDS to track career and job training services provided and performance outcomes.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Employment placement services are provided in two ways. First, the participant may receive employment placement services through JobGateway® and the Commonwealth Workforce Development System (CWDS). The participant can conduct self–directed job searches; PA CareerLink® staff may assist participants through staff assisted job searches; or PA CareerLink® staff may conduct job searches by reviewing posted job orders and participant qualifications, and make referrals with or without the participant's knowledge. Alternatively, participants can work through LVERs, who interact with employers seeking job candidates. Veteran and covered person's employment placement services are measured the same as non-veterans with the exception of the negotiated performance targets. The commonwealth will utilize CWDS to track employment placement services and performance outcomes.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

Veteran and covered person's job-driven training and subsequent placement services will be measured the same as non-veterans with the exception of the negotiated performance targets. The commonwealth will utilize CWDS to track job-driven training and placement services provided and performance outcomes.

(H) THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

The following is a list of DVOP specialist and LVER staff to include hire dates, followed by mandatory training completion dates:

DVOP Specialist, Hire Date, Training Deadline

Donna Acker, 5/4/2009, 10/31/2010

Richard Boyer, 3/31/2014, 9/27/2015

Robert Clark, 6/28/2010, 12/25/2011

Severio Costello, 9/2/2014, 2/29/2016

Jill Counts–Weaverling, 9/30/2012, 3/29/2014

Thomas Cramer, 9/28/2015, 3/26/2017

Vicki Curtis, 8/10/2007, 2/5/2009

Robert Eddy, 8/17/2015, 2/12/2017

Shannon Eidem, 4/5/2010, 10/2/2011

Ian Emmett, 8/24/2015, 2/19/2017

Roy Evans, 1/5/2015, 7/3/2016

William Fallon, 7/3/2015, 12/29/2016

Timothy French, 6/1/2009, 11/28/2010

David Grey, 6/1/2015, 11/27/2016

Shawn Griffin, 6/9/2014 , 12/6/2015

Robert Haefner, 10/27/2014, 4/24/2016

Patrick Hayden, 10/5/2015, 4/2/2017

John Haydu, 4/29/2013, 10/26/2014

Carl Heilbrun, 6/15/2015, 12/11/2016

Randal Hollenbach, 3/22/2010, 9/18/2011

Samuel Jocuns, 5/3/2010, 10/30/2011

Samuel Jones, 7/16/2001, 1/12/2003

Don Kelsey, 3/4/2013, 8/31/2014

Karen McFadden, 12/13/2010, 6/10/2012

Catherine Miller, 10/7/2009, 4/5/2011

Jason Owings, 4/20/2015, 10/16/2016

Ryan C. Paglia, 12/3/2007, 5/31/2009

Porter Peaden III, 6/22/2002, 12/19/2003

Jesse Putnam, 9/28/2015, 3/26/2017

Loretta Reeger, 2/8/2010, 8/7/2011

Jeffrey Rhein, 11/25/2002, 5/23/2004

Thomas Sheehan, 5/12/2014, 11/8/2015

Byron Sutton, 10/1/2012, 3/30/2014

George Tanner, 7/20/2015, 1/15/2017

Billy Walls, 12/8/2014, 6/5/2016

George Warholic, 1/4/2004, 7/2/2005

Clifford W. White, 1/14/2008, 7/12/2009

Rodney Wyatt, 3/22/2010, 9/18/2011

Sean Zielinski, 7/5/2005, 1/1/2007

LVER, Hire Date, Training Deadline

Raymond Bates, 9/27/2003, 3/25/2005

Joanne Bell, 4/18/2009, 10/15/2010

Rodger Campbell, 3/1/2004, 8/28/2005

Randy A. Carlson, 11/3/2007, 5/1/2009

Gregory Crooks, 9/4/2002, 3/2/2004

Sarita Dejesus, 5/15/2010, 11/11/2011

Patrick Hoagland, 6/26/2010, 12/23/2011

Vincent Jones, 10/18/2010, 4/15/2012

Thomas Kucewicz, 7/19/2003, 1/14/2005

Peter Marberger, 5/17/2010, 11/13/2011

Boyd (Hugh) McCullough, 9/24/2005, 3/23/2007

Charles Merenda, 5/19/2008, 11/15/2009

Douglas Monroe, 10/19/2015, 4/16/2017

Charles Montalbano, 1/17/1988, 7/15/1989

Mark Sieminski , 8/10/2015, 2/5/2017

Alan (Herbert) Smith, 11/3/2007, 5/1/2009

Gene (Carl) Young, 7/14/2007, 1/9/2009

(I) SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

N/A

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

(A) ECONOMIC PROJECTIONS AND IMPACT

States must:

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D))(MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

Section 503 of the 2006 Older Americans Act (OAA) Amendments requires the Governor or his designee to submit a Senior Community Service Employment Program (SCSEP) State Plan in order to receive SCSEP funds. The SCSEP promotes part–time employment opportunities in community service activities for unemployed low–income persons who are age 55 or older and who have poor employment prospects. The purpose of the SCSEP State Plan is to foster both short–term and long–term coordination among the various national and state SCSEP grantees and sub–grantees operating within the commonwealth. The SCSEP's goals are to foster individual economic self–sufficiency and promote useful opportunities in community service activities and to increase the number of persons who may enjoy the benefits of unsubsidized employment.

The SCSEP is administered at the federal level by the United States Department of Labor's (USDOL) Employment and Training Administration. The USDOL currently provides SCSEP funds to the Pennsylvania Department of Aging and nine national organizations that provide SCSEP services in the commonwealth as follows: American Association of Retired Persons (AARP); Associacion Nacional Pro Personas Mayores (ANPPM); Experience Works, Inc. (EW); Goodwill Industries, Inc. (GI); National Asian Pacific Center on Aging (NAPCA); National Caucus/Center on Black Aged, Inc. (NCBA); National Council on the Aging (NCOA); Senior Service America, Inc. (SSA); and the National Urban League (NUL). In Fiscal Year (FY) 2015–16, the Department of Aging will be contracting directly with Experience Works, Inc. to provide SCSEP services in 42 of the 52 Area Agencies on Aging (AAAs) Planning and Service Areas (PSAs). The Department of Aging issued a Request for Grant Applications (RFGA) for SCSEP services in four regions of the commonwealth in November 2012. The RFGA was issued because a total of 39 AAAs had relinquished their SCSEP funds to the Department of Aging. Since 2012, three more AAAs have relinquished their SCSEP funds to the Department of Aging. The Department of Aging will continue to directly provide 10 AAAs with SCSEP funds in FY 2015–16. These 10 AAAs are: Lancaster; Westmoreland; Luzerne/Wyoming; Washington/Fayette/Greene; Allegheny; Lycoming/Clinton; Lehigh; Northampton; Erie; and Philadelphia.

Using the U.S. Census Bureau's Local Employment Dynamics (LED) data, the following are the statewide industry long–term employment projections (2012–2022) for the top 25 occupations with the highest percentage of workers age 55 and older. The list shows the industry title and the percent employment change.

Charter Bus Industry: 7.7%

Death Care Services: 1.2%

School & Employee Bus Transportation: 8.3%

Religious Organizations: 1.0%

Motor Vehicle/Part Merchant Wholesalers: 6.4%

Apparel Knitting Mills: –47.2%

Florists: –34.8%

Taxi & Limousine Service: –1.3%

Fiber, Yarn & Thread Mills: –40.0%

Cut & Sew Apparel Manufacturing: –45.5%

Scenic/Sightseeing Transportation, Land: 15.1%

Interurban & Rural Bus Transportation: –6.5%

Other Ground Passenger Transportation: 25.7%

Junior Colleges: 1.8%

Fabric Mills: –46.9%

Water, Sewage & Other Systems: 17.9%

Private Households: –1.7% Hardware Manufacturing: –21.8%

Iron & Steel Mills & Ferroalloys: –4.0%

Professional & Similar Organizations: 10.2%

Offices of Real Estate Agents & Brokers: 2.7%

Commercial & Service Industry Machinery: –7.9%

Pulp, Paper & Paperboard Mills: –7.6%

Spring & Wire Product Manufacturing: –14.8%

Purchased Steel Product Manufacturing: 1.8%

Source: 2012–22 Long–Term Industry Employment Projections

Using the Census Bureau's North American Industry Classification System (NAICS) codes, the Center for Workforce Information and Analysis used the staffing patterns to determine which occupations were most likely to be found in those industries with the highest percentage of older workers. The following list identifies the statewide occupational long–term employment projections for the top employing occupations in the industries with the highest percentage of workers ages 55 and older. For example, School and Employee Bus Transportation is an industry that employs a high percentage of older workers and is projected to grow between 2012 and 2022. The Standard Occupational Classification (SOC) code Bus Drivers: School or Special Client is an occupation in the School and Employee Bus Transportation industry that is projected to have 643 annual openings, and older workers are a good fit for these jobs. The list shows the occupational title and total annual openings projected.

Bus Drivers, School or Special Client: 643

Maids & Housekeeping Cleaners: 1,652

Clergy: 349

Secretaries: 2,256

Childcare Workers: 2,303

Office Clerks, General: 3,274

Directors, Religious Activities & Education: 309

Janitors & Cleaners: 2,541

Maintenance & Repair Workers, General: 1,725

Bookkeeping & Accounting Clerks: 1,276

Personal Care Aides: 2,120

Sales Representatives: 1,949

Labor Relations Specialists: 91

Taxi Drivers & Chauffeurs: 283

Bus Drivers, Transit & Intercity: 163

Light Truck or Delivery Services Drivers: 758

Landscaping &Y Groundskeeping Workers: 1,479

Preschool Teachers: 586

Laborers & Material Movers: 4,437

General & Operations Managers: 1,678

Self–enrichment Education Teachers: 282

Customer Service Representatives: 3,709

Sewing Machine Operators: 27

Musicians & Singers: 126

Receptionists & Information Clerks: 1,584

Stationary Engineers & Boiler Operators: 95

Teacher Assistants: 1,134

Supervisors – Office & Admin Support: 1,805

Executive Secretaries Admin Asst's: 331

Rolling Machine Setters/Oprs/Tndrs: 61

Funeral Attendants: 38

Real Estate Sales Agents: 192

Supervisors – Production Workers: 407

Retail Salespersons: 7,036

Bus, Truck & Diesel Engine Mechanics: 340

Source: 2012–22 Long–Term Industry Employment Projections

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

The following is a list of statewide occupational employment projections for short or moderate–term on–the–job training occupations with 500 or more annual job openings.

Retail Salesperson: 7,036

Cashiers: 6,747

Combined Food Preparation & Serving Workers: 6,494

Waiters & Waitresses: 4,756

Laborers & Freight, Stock & Material Movers: 4,347

Customer Service Representatives: 3,709

Office Clerks, General: 3,274

Home Health Aides: 3,184

Janitors & Cleaners: 2,541

Stock Clerks & Order Fillers: 2,344

Childcare Workers: 2,303

Secretaries: 2,256

Personal Care Aides: 2,120

Sales Representatives: 1,949

Maids & Housekeeping Cleaners: 1,652

Receptionists & Information Clerks: 1,584

Construction Laborers: 1,547

Landscaping & Groundskeeping Workers: 1,479

Bartenders: 1,416

Bookkeeping, Accounting & Auditing Clerks: 1,276

Food Preparation Workers: 1,225

Packers & Packagers, Hand: 1,220

Dishwashers: 1,188

Security Guards: 1,167

Tellers: 1,160

Hosts & Hostesses: 1,159

Cooks, Restaurant: 1,100

Farmworkers & Laborers, Crop & Nursery: 1,068

Police & Sheriff's Patrol Officers: 957

Social & Human Service Assistants: 915

Amusement & Recreation Attendants: 878

Team Assemblers: 843

Billing & Posting Clerks: 827

Medical Secretaries: 792

Shipping, Receiving & Traffic Clerks: 785

Operating Engineers: 784

Counter Attendants: 773

Dining Room Attendants & Bartender Helpers: 771

Food Servers, Nonrestaurant: 724

Bus Drivers, School or Special Clients: 643

Inspectors, Testers & Sorters: 640 Cooks, Institution & Cafeteria: 602

Insurance Sales Agents: 577

Helpers – Production Workers: 577

Industrial Truck & Tractor Operators: 556

Bill & Account Collectors: 553

Counter & Retail Clerks: 536

Correctional Officers & Jailers: 500

Source: 2012–22 Long–Term Occupational Employment

Projections Short–term or Moderate–term training are defined as follows: basic tasks and skills are learned through a period of on–the–job training. A high school diploma may be required.

As of June 30, 2015, 64 percent of the SCSEP individuals served by the Department of Aging and nine National SCSEP sponsors had a high school diploma or less. Generally speaking, the jobs listed above are appropriate for the majority of SCSEP participants because they require short or

moderate term on–the–job training. Depending on the participant's assessment and Individual Employment Plan (IEP), training for a job in the local workforce development area that has many annual openings will result in a better outcome for the participant. Another tool that will be considered to find jobs for SCSEP participants is the statewide list of High Priority Occupations (HPOs) that require short term on–the–job training and moderate term on–the–job training. HPOs are occupations that are in demand by employers, have higher skill needs, and are more likely to provide family sustaining wages.

In reviewing the future jobs available by Volume Growth, Percent Growth and Annual Openings in the Economic Analysis section of this Strategic Plan, there are many jobs that require short-term OJT and moderate term OJT, which are the skills that the majority of the SCSEP participants served in the commonwealth possess. Recipients are provided with on the job training through their Community Service Training Assignments for several of these jobs as well as classroom training for other jobs. For example, the PA Department of Aging (PDA) has provided classroom training for SCSEP participants in past years to become Personal Care Aides and PDA plans on funding this training again during the term of this state plan. PDA's SCSEP Sub-grantees have also provided classroom training for participants to become Customer Service Representatives. There are many host agency training assignments such as Combined-Food Prep/Serving Workers, Janitors, and Office Clerks that can result in unsubsidized employment for SCSEP participants.

3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))

The following is a list of statewide occupational employment projections for short or moderate–term on–the–job training occupations with 500 or more annual job openings.

Retail Salesperson: 7,036

Cashiers: 6,747

Combined Food Preparation & Serving Workers: 6,494

Waiters & Waitresses: 4,756

Laborers & Freight, Stock & Material Movers: 4,347

Customer Service Representatives: 3,709

Office Clerks, General: 3,274

Home Health Aides: 3,184

Janitors & Cleaners: 2,541

Stock Clerks & Order Fillers: 2,344

Childcare Workers: 2,303

Secretaries: 2,256

Personal Care Aides: 2,120

Sales Representatives: 1,949

Maids & Housekeeping Cleaners: 1,652

Receptionists & Information Clerks: 1,584

Construction Laborers: 1,547

Landscaping & Groundskeeping Workers: 1,479

Bartenders: 1,416

Bookkeeping, Accounting & Auditing Clerks: 1,276

Food Preparation Workers: 1,225

Packers & Packagers, Hand: 1,220

Dishwashers: 1,188

Security Guards: 1,167

Tellers: 1,160

Hosts & Hostesses: 1,159

Cooks, Restaurant: 1,100

Farmworkers & Laborers, Crop & Nursery: 1,068

Police & Sheriff's Patrol Officers: 957

Social & Human Service Assistants: 915

Amusement & Recreation Attendants: 878

Team Assemblers: 843

Billing & Posting Clerks: 827

Medical Secretaries: 792

Shipping, Receiving & Traffic Clerks: 785

Operating Engineers: 784

Counter Attendants: 773

Dining Room Attendants & Bartender Helpers: 771

Food Servers, Nonrestaurant: 724

Bus Drivers, School or Special Clients: 643

Inspectors, Testers & Sorters: 640 Cooks, Institution & Cafeteria: 602

Insurance Sales Agents: 577

Helpers – Production Workers: 577

Industrial Truck & Tractor Operators: 556

Bill & Account Collectors: 553

Counter & Retail Clerks: 536

Correctional Officers & Jailers: 500

Source: 2012–22 Long–Term Occupational Employment

Projections Short–term or Moderate–term training are defined as follows: basic tasks and skills are learned through a period of on–the–job training. A high school diploma may be required.

As of June 30, 2015, 64 percent of the SCSEP individuals served by the Department of Aging and nine National SCSEP sponsors had a high school diploma or less. Generally speaking, the jobs listed above are appropriate for the majority of SCSEP participants because they require short or moderate term on–the–job training. Depending on the participant's assessment and Individual Employment Plan (IEP), training for a job in the local workforce development area that has many annual openings will result in a better outcome for the participant. Another tool that will be considered to find jobs for SCSEP participants is the statewide list of High Priority Occupations (HPOs) that require short term on–the–job training and moderate term on–the–job training. HPOs are occupations that are in demand by employers, have higher skill needs, and are more likely to provide family sustaining wages.

The education levels for SCSEP participants in the commonwealth as of June 30, 2015 were as follows: 4% - 8th grade and under; 13% - 9th-11th grade; 47% - High School Graduate; 19% - 1-3 years of college; 2% - Post Secondary Certificate; 4% - Associate's Degree; 8% - Bachelor's Degree; 1% - Post Graduate Work; 2% - Master's Degree. Since 64 percent of the SCSEP individuals served by the Department of Aging and nine National SCSEP sponsors in PY 14 had a high school diploma or less, it can be inferred that in general most of the jobs that the majority of participants possess the education level and skills to obtain require short-term OJT and moderate term OJT such as the jobs listed above. Each participant's specific skills and education level will be

determined during the assessment and used to determine an Individual Employment Plan with a goal of unsubsidized employment.

(B) SERVICE DELIVERY AND COORDINATION

States must:

1. PROVIDE A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS

This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

There are varying degrees of involvement by the AAAs and the nine National SCSEP sponsors with the PA CareerLink® centers. Generally speaking, the AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in the Commonwealth Workforce Development System (CWDS); PA CareerLink® staff refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co–enroll eligible individuals in WIOA, OVR, and Veterans programs to more efficiently use federal and state workforce development funds; co–locate SCSEP staff at the PA CareerLink® centers on a full– or part–time basis; and co–locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives. The SCSEP is represented on all 22 Local Workforce Development Boards in the commonwealth by AAA directors, AAA SCSEP staff, national SCSEP operators, and county human service agency directors.

An interagency work group has been established and meets on a regular basis to consider ideas, discuss agency initiatives and goals and how partner agencies can help in achieving them, and share best practices. The interagency work group is an ad hoc group comprised of executive and program level staff from the Departments of Aging, Education, Human Services, Labor & Industry, Agriculture, Community and Economic Development, Military and Veterans Affairs, and Corrections, as well as the Governor’s Office. The work group is coordinated by the Governor’s Office and led by the Deputy Secretary of Workforce Development within the Department of Labor & Industry.

The State Workforce Development Board is another body that works to promote alignment and collaboration across programs. The Secretaries of Labor &Industry, Department of Community and Economic Development, Department of Human Services, PA Department of Education and the Department of Agriculture all serve on the Board. Other agency secretaries are invited to participate in Board meetings when populations they serve are expected to be discussed, such as the Secretary of the Department of Corrections for discussions involving ex-offenders and re-entry programs, the Secretary of Aging when discussing older workers or the Secretary of the Department of Military and Veterans Affairs for discussions involving veterans.

(B) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))

The PDA has and will continue to reinforce to Area Agency on Aging (AAA) sub-grantees that upon intake into the SCSEP program, job developers must evaluate the needs of participants to determine if they have any unmet needs. Each year, during recertification and at least twice a year during reassessments, job developers are trained to be aware of any changing needs of the participants, as is common in this demographic. Building on the collective need of the SCSEP program participants, speakers from the local AAA are scheduled to present at quarterly, semi-annual or annual participant meetings on various Aging programs funded by the PDA and administered by the AAA that can help participants. Some of these programs and services are APPRISE, which provides information about Medicare services, protective services, transportation, prescription drug program, family caregiver support program, adult day care services, etc. For PDA's non-AAA sub-grantee(s), the primary action that they need to coordinate with State activities under the other titles of the OAA is to establish a solid working relationship with any aging- or disability-related organizations, including the AAA. It is vital that all SCSEP sub-grantees but especially non-AAA sub-grantee(s) be cognizant when interacting with participants, remaining alert to critical issues and changes that occur within their lives so they can develop referral ideas and program opportunities that benefit participants.

(C) ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH-BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

The PA Link to Aging and Disability Resources (The Link) is a focal point for Pennsylvania residents seeking information and referrals for services to the elderly and adults with disabilities. The PA Link, through its collaborative network of partners including state and local, public and private agencies, improves access to information and linkages to long term living supports and services. Private and public entities and programs providing services to older individuals such as assisted living, nursing home, vocational rehabilitation, and transportation and providers serving persons with disabilities are just a few of the agencies that comprise the Link. Many SCSEP providers are members of the Link which will serve them well in learning about the myriad of local services available that can help SCSEP participants in general.

The PDA has provided information and presented about SCSEP to other state partner agencies that administer programs that serve older Pennsylvanians. The Departments of Revenue, Human Services and Transportation and the Office of Vocational Rehabilitation provide funds to community and faith-based organizations to serve older Pennsylvanians. PDA met with the Department of Human Services Aging Medicaid Waiver staff in January 2016 to discuss how SCSEP could help Aging Waiver consumers who want to work. SCSEP sub-grantees have been made aware of free and reduced-fare public transportation programs for Pennsylvanians age 65 and older and a reduced-fare program for persons with disabilities under the age of 65. All of these transportation programs are administered by the Pennsylvania Department of Transportation. In March 2016, PDA staff presented on SCSEP at an Office of Vocational Rehabilitation one-day roundtable discussion on other State programs and services available to assist individuals with disabilities. For the next SCSEP training, the Office of Vocational Rehabilitation will be presenting on their services and how they can assist SCSEP participants. PDA will also be inviting Department of Human Services Medical Assistance Program staff to present to our sub-grantees on how SCSEP participants can

continue to remain in the SCSEP and receive medical assistance benefits. We also plan on including staff from the Department of Human Services to discuss the low-income heating assistance program to our sub-grantees at a future training.

(D) ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

Each month, the Center for Workforce Information & Analysis (CWIA) provides the Department of Aging with Job Posting files by Local Workforce Development Area. The Department of Aging sends this information to its SCSEP sub–grantees and National Sponsors. Senior staff from the CWIA have presented at annual SCSEP trainings in the past few years. The trainings consisted of an explanation of the many available labor market information products and how SCSEP coordinators can use these products to find SCSEP participants' jobs.

On March 29, 2016, the PDA informed its sub-grantees that it would entertain proposals to provide Direct Care Worker training to SCSEP participants and other older individuals in PY 15 and 16. Objective 2.5 of the 2012-16 PDA State Plan on Aging states the following: Expand employment opportunities for older Pennsylvanians and job opportunities that support older Pennsylvanians. In PY 13 and 14, the PDA provided the Westmoreland County Community College, which is a PDA sub-grantee, with non-SCSEP funds to provide Direct Care Worker training to SCSEP participants and other older individuals. The training consisted of 11 classes at 7 hours per class for a total of 77 hours. Copies of driver's licenses were gathered for documentation of age and all participants applied for and received state police and child abuse clearances. All participants also had a 2-step TB test performed. On the last day of class, all participants received a certificate of completion. There was a 90% job placement rate after the class concluded. Because of the success of this training, the PDA would like to replicate it with other sub-grantees. The PDA is also coordinating with the PA School Bus Association (PSBA) to train and hire SCSEP participants and non-SCSEP eligible individuals as drivers and aides. The Board Chairman and the Executive Director of the PSBA presented on this future partnership on March 29, 2016 to all PDA SCSEP sub-grantees as well as staff from NCBA, National Urban League, Experience Works, NCOA, and SSAI. Also on March 29, 2016 CVS Health presented to all PDA SCSEP sub-grantees as well as staff from the state of Delaware, NCBA, National Urban League, Experience Works, NCOA, and SSAI on job opportunities for SCSEP participants with CVS Health. CVS Health sends PDA a list of job opportunities each Monday and PDA sends the list to all SCSEP sub-grantees and national SCSEP sponsors operating in the commonwealth.

(E) ACTIONS THE STATE WILL TAKE TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)

There are varying degrees of involvement by the AAAs and the nine National SCSEP sponsors with the PA CareerLink® one-stop system. The AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: Refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in CWDS; PA CareerLink® staff refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co-locate SCSEP staff at the PA CareerLink® centers on a full- or part-time basis; and co-locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives.

(F) EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Experience Works (EW), engages with the Tioga County Development Corporation (TCDC), which is a Local Economic Development Office in the very rural northern tier of the commonwealth. Quarterly meetings are held between EW and TCDC. These meetings have resulted in referrals of older individuals to EW from TCDC and EW engaging the TCDC as one of its host agencies. In May 2015, the TCDC awarded EW with a Certificate of Appreciation for the service and commitment that EW provides to its participants. In the future, EW will be starting to place a greater emphasis on broadening these partnerships with the Local Economic Development Offices. In a very rural three county area in the Southwest corner of the commonwealth, the Southwest PA Area Agency on Aging (AAA) maintains relationships with key individuals at local organizations involved in economic development, such as the Mon Valley Progress Council, the Middle Monongahela Development Association, and the Washington and Fayette County Chambers of Commerce, as well as the Washington Business District Authority, and the Washington County Foundation. The AAA has requested their participation in area job fairs and also to present during participant meetings on employment opportunities.

2. DESCRIBE THE LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)

At the local level, Business Service Teams (BSTs) in the PA CareerLink® centers work with area employers to identify their talent needs and refer qualified candidates to fill those positions. This includes referring candidates for on-the-job or customized training where the referred individual is not immediately ready to take on the full duties of the position. BSTs also have access to a plethora of labor market information that can be helpful to employers in setting wages and benefits that will attract high-quality candidates. BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post-secondary providers who can serve as a source of talent for employers. Two of PDA's sub-grantees already work on a daily basis with the BSTs. PDA will pursue additional partnerships with BSTs through its strong relationship with the Pennsylvania Department of Labor & Industry. In PY 16, the PDA will implement the On-the-Job Experience (OJE) training option. Through OJEs, PDA will engage employers to hire participants. OJEs will provide incentives for employers to hire SCSEP participants.

3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))

According to the SCSEP Analysis of Service to Minority Individuals PY 2013, Volume II, April 26, 2015 the minority population in the commonwealth was 24.9 percent. Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 51 percent of the individuals served were minorities, which is more than double the statewide percentage. The commonwealth's previous strategies in serving minorities will continue because minorities are being served at a much higher level than their proportionate share. SCSEP providers

shall continue to make extensive outreach efforts to potential minority SCSEP participants and communities, specifically to community groups, senior centers, cultural/social groups, fraternal organizations, chambers of commerce, libraries, community based media, community leaders and retail stores. Current partnerships with minority organizations will be renewed. Outreach to minority populations will continue to include paid advertisements and coordination with organizations that serve minority groups.

4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

In PA, 12.6% of the population age 55 and older is below 125% of the poverty level (see response to Element 5 for the number of individuals under 125 percent of the poverty level for each county). In Philadelphia County, 25.2% of the age 55 and older population is below 125% of the poverty level, which is by far the highest percentage in the state. The next five counties with the highest percentages are all rural and these are: Fayette County-17.8%; Potter-16.5%, Greene-16.3%, Bedford-16.1% and Jefferson-16%. In these counties and others in the commonwealth, many older low-income individuals have needs for food, shelter, clothing, transportation, education, socialization, medical, and more. The agencies meeting the community service needs of SCSEP participants are: the PA Department of Human Services' (DHS) County Assistance Offices which provide food stamps, medical assistance and cash assistance; Local Community Action Programs funded by the Department of Community and Economic Development and the DHS which provide assistance with paying utility bills and rent and food banks; County Housing Authorities and local Homeless Shelters which provide assistance with housing; Goodwill and other local Dress for Success organizations which provide clothing; the PA Department of Education's local Adult Education providers that provide literacy, ESL and GED classes; and the local Area Agency on Aging which provides socialization services through senior centers as well as home delivered meals, advice with Medicare, and protective services and transportation. The PA Department of Revenue, through state lottery dollars, provides rent and property tax relief for low income older Pennsylvanians. The PDA has and will continue to work with these agencies at the state level and filter this information to local SCSEP sub-grantees to better serve SCSEP participants.

5. DESCRIBE THE LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

In the past decade, the Department of Aging went from 52 SCSEP sub–grantees to its current 11. The Department of Aging will be issuing a Request for Grant Applications for SCSEP services in at least 42 of the 52 AAA Planning and Service Areas (PSAs) in December 2017. Selected providers will begin to provide SCSEP services in the four designated AAA PSA Regions on July 1, 2018.

The PDA plans on enhancing its relationship with the Pennsylvania Department of Labor & Industry (L&I) and through L&I, the local Workforce Development Boards and the PA CareerLink® centers. This could result in more employment and training services for SCSEP participants such as working

with the Business Service Teams at the PA CareerLink® centers to improve unsubsidized placements. The Department has met or exceeded each of its performance goals in PY 14 and historically; therefore there is no plan at this time to change program operators. PDA will provide technical assistance to those sub-grantees that fail to meet any performance goal. In past years, Joyce Welsh provided an entire day of training to SCSEP sub-grantees on how to meet SCSEP Performance Goals. PY 15 may not be reflective of PDA's actual performance because of the budget impasse and other internal issues with a few sub-grantees.

6. DESCRIBE A STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

The PDA will work with the PA Department of Labor & Industry to present at future PDA webinars or trainings on ways to assist SCSEP participants in their job search and obtaining unsubsidized jobs. One of the topics will be targeting High Priority Occupations as job goals in the initial IEPs. On May 18, 2016, PDA staff will be presenting to PA CareerLink® staff about SCSEP and older workers in general during a breakout session at the PA Partners Conference on the topic, Preparing for the Silver Tsunami: Serving Older Workers at CareerLinks. There will be two co-presenters. One will be from a local PA CareerLink® and one from a local WDB. PDA has trained and will continue to train SCSEP sub-grantees to follow-up with participants who exit for voluntary or durational limit reasons in the quarter after exit quarter to determine if they found unsubsidized employment. PDA will implement OJEs in PY 16 with the goal of improving participants' entry into unsubsidized employment.

(C) LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

States must:

1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

Projects authorized by Title V are to serve individuals age 55 and older who are unemployed and at or below 125% of the most recent federal poverty level. According to the most recent data from the PA Department of Labor & Industry's Center for Workforce Information and Analysis, Allegheny County and Philadelphia County have the highest number of unemployed individuals age 55 and older. Philadelphia County also has the highest percentage of individuals age 55 and older who are below the poverty level. The next five counties with the highest percentages of individuals age 55 and older who are below the poverty level are all rural (Fayette, Potter, Greene, Bedford and Jefferson). In addition, federal regulatory priorities of service govern what populations are served first and there is also a Most in Need performance goal that the Department must meet. Priority of Service is provided to Veterans and qualified spouses with further preference to those persons 65 and older or individuals with: a disability; limited English proficiency; low literacy skills; reside in a rural area; low employment prospects; failed to find employment through WIOA Title I services; homeless or at risk of homelessness. Most in Need goals include the aforementioned priority factors as well as additional factors. Populations that are included in the Most in Need service goal and the priority of service factors are the populations that the PDA will strive to serve in PY 16 and beyond.

2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

The following lists the counties where the SCSEP project will take place in PY 2016 to include the number of SCSEP authorized positions and any change from PY 2015 to PY 2016: Adams 2; Allegheny 44 (-2); Armstrong 0; Beaver 3; Bedford 1; Berks 10 (+1); Blair 6; Bradford 4 (-1); Bucks 14 (+1); Butler 6 (+1); Cambria 7; Cameron 1; Carbon 2; Centre 3; Chester 7; Clarion 3; Clearfield 3; Clinton 1; Columbia 3; Crawford 4 (-1); Cumberland 8 (-1); Dauphin 6 ;Delaware 12 (+1); Elk 1; Erie 13 (+1); Fayette 8 (-1); Forest 0; Franklin 6; Fulton 1; Greene 1 (-1); Huntingdon 3; Indiana 5; Jefferson 3; Juniata 2; Lackawanna 7; Lancaster 16; Lawrence 4; Lebanon 3; Lehigh 10; Luzerne 14 (-1); Lycoming 5; McKean 0; Mercer 5 (+1); Mifflin 5; Monroe 10 (+2); Montgomery 24 (+4); Montour 2; Northampton 6; Northumberland 4 (-1); Perry 3; Philadelphia 101 (-2); Pike 7 (+1); Potter 3; Schuylkill 6 (-1); Snyder 2 (-1); Somerset 5 (-1); Sullivan 1; Susquehanna 2; Tioga 2 (+1); Union 3; Venango 1; Warren 0; Washington 7; Wayne 3; Westmoreland (-1); Wyoming 2 (+1); York 7

3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

In comparing PY 16 authorized positions against the current enrollments from SCSEPED, there are 8 out of 67 counties in the commonwealth with slot imbalances greater than 5. These slot imbalances are in the following counties: Bucks, Chester, Dauphin, Luzerne, Montgomery, Philadelphia, Tioga, and Venango. In Luzerne County, they are overenrolled because this sub-grantee overenrolls heavily and they are a high performer. In the other counties with slot imbalances greater than 5, the PDA will work with the new sub-grantees in PY 16 to move participants from overenrolled PDA sub-grantees to under-enrolled national grantees and vice versa through grantee transfers, if approved by DOL. Through natural attrition and placing participants in unsubsidized jobs in overserved counties, the Department of Aging will not refill the slots in overserved counties but instead will begin to fill slots in underserved counties where a sub-grantee serves multiple counties.

4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

In PY 16, the PDA will monitor authorized slots vs. actual enrollments on a quarterly basis for all sub-grantees to assure that slot imbalances greater than +5 do not occur. This will be done through SCSEPED and also from monitoring the sub-grantee Quarterly Progress Reports where we will compare current participants to authorized slots. Quarterly calls will be made with all SCSEP grantees operating in the commonwealth in PY 16, when there are slot imbalances greater than 5, to discuss corrective actions to remedy these imbalances. PDA did do this in PY 15 and it resulted in more equitable distribution in two counties for AARP Foundation. AARP Foundation was overserved in Dauphin County by 9 slots and underserved in neighboring Schuylkill County by 15 slots on April 1, 2015. Through natural attrition and unsubsidized job placements in Dauphin County, AARP did not refill the slots in Dauphin County but instead moved these funds to serve Schuylkill County residents. As of October 1, 2015, AARP's SCSEP program is now only overserved by 1 slot in Dauphin County and underserved by 9 slots in Schuylkill County which is an improvement.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

Of the eight counties with slot imbalances greater than five, 6 are urban areas and 2 are rural areas. In these counties, PDA will work with the new sub-grantees in PY 16 to move participants from overenrolled PDA sub-grantees to under-enrolled national grantees and vice versa through grantee transfers, if approved by DOL. Through natural attrition and placing participants in unsubsidized jobs in overserved counties, the PDA will not refill the slots in overserved counties but instead will begin to fill slots in underserved counties where a sub-grantee serves multiple counties.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

In PY 16 and subsequent years, PDA will monitor on a quarterly basis the number of individuals afforded priority of service against prior year quarterly data to strive for continuous improvement. PY 15 Quarter 3 data indicates the following service levels for individuals afforded priority of service: Veterans-137 participants or 19% of total participants served; Persons 65 and older- 236 participants or 32% of total participants served; Persons with Disabilities-169 participants or 24% of total participants served; Persons with Limited English Proficiency-31 participants or 4% of total participants served; Persons with Low Literacy Skills-53 participants or 7% of total participants served; Persons residing in rural areas-155 participants or 22% of total participants served; Persons with Low Employment Prospects-600 participants or 84% of total participants served; Persons who Failed to Find Employment through WIOA Services-112 participants or 16% of total participants served; and Persons who are homeless or at risk of homelessness-424 participants or 59% of total participants served. PDA will also work with its Census Data staff in PY 16 to determine if there are any specific census data sets for these priority factors for individuals age 55 and older or on a statewide total population. PDA can then gauge if it is serving these populations in proportion to the statewide percentages for each individual priority factor.

5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

The following list shows the statewide total number of eligible individuals under 125 percent of the poverty level (450,699) and the number of individuals under 125 percent of the poverty level for each county. This data was obtained from the U.S. Bureau of Census, 2009-2013 American Community Survey.

Pennsylvania: 450,699 (12.6%)

Adams: 2,552 (8.6%)

Allegheny: 46,593 (12.7%)

Armstrong: 3,354 (14.7%)

Beaver: 6,319 (11.3%)

Bedford: 2,606 (16.1%)

Berks: 12,325 (11.2%)

Blair: 5,154 (13.2%)

Bradford: 2,936 (14.8%)

Bucks: 12,909 (7.2%)

Butler: 5,282 (10.0%)

Cambria: 6,802 (14.5%)

Cameron: 261 (13.7%)

Carbon: 2,319 (11.1%)

Centre: 2,616 (8.0%)

Chester: 8,604 (6.7%)

Clarion: 1,661 (14.2%)

Clearfield: 3,472 (14.1%)

Clinton: 1,567 (14.1%)

Columbia: 2,802 (14.6%)

Crawford: 3,937 (14.7%)

Cumberland: 4,887 (7.3%)

Dauphin: 8,534 (11.7%)

Delaware: 14,830 (10.1%)

Elk: 1,182 (11.2%)

Erie: 10,380 (13.7%)

Fayette: 7,857 (17.8%)

Forest: 381 (15.8%)

Franklin: 4,450 (10.1%)

Fulton: 613 (13.3%)

Greene: 1,786 (16.3%)

Huntingdon: 1,965 (14.6%)

Indiana: 3,178 (12.6%)

Jefferson: 2,261 (16.0%)

Juniata: 942 (12.8%)

Lackawanna: 9,455 (14.4%)

Lancaster: 13,586 (9.7%)

Lawrence: 3,903 (13.2%)

Lebanon: 3,955 (10.0%)

Lehigh: 10,840 (11.6%)

Luzerne: 13,999 (14.2%)

Lycoming: 4,471 (13.1%)

McKean: 1,633 (12.8%)

Mercer: 4,681 (12.8%)

Mifflin: 2,275 (15.4%)

Monroe: 5,542 (12.3%)

Montgomery: 17,426 (7.9%)

Montour: 717 (12.5%)

Northampton: 7,895 (9.2%)

Northumberland: 4,531 (15.2%)

Perry: 1,122 (8.6%)

Philadelphia: 87,339 (25.2%)

Pike: 1,777 (9.8%)

Potter: 995 (16.5%)

Schuylkill: 6,718 (14.6%)

Snyder: 1,495 (13.3%)

Somerset: 3,794 (15.0%)

Sullivan: 357 (13.9%)

Susquehanna: 1,845 (12.9%)

Tioga: 2,047 (15.2%)

Union: 1,106 (9.9%)

Venango: 2,355 (13.0%)

Warren: 1,767 (12.6%)

Washington: 7,494 (11.3%)

Wayne: 2,127 (12.1%)

Westmoreland: 13,195 (10.7%)

Wyoming: 1,136 (13.0%)

York: 11,804 (9.9%)

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

The statewide distribution of eligible individuals who reside in rural and urban areas is 20 percent and 80 percent respectively. This data was obtained from the U.S. Bureau of Census, 2009-2013 American Community Survey. Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 20 percent of the participants served resided in rural area and 80 percent resided in urban areas.

B. HAVE THE GREATEST ECONOMIC NEED

According to data from the U.S. Bureau of Census, 2009-2013 American Community Survey, there were 450,699 individuals in the commonwealth who were age 55 and older and whose incomes were below 125 percent of the poverty level. Of this total, 303,760 individuals had incomes below the poverty level. Thus, 67 percent of the SCSEP eligible population in the commonwealth was determined to have the greatest economic need (below poverty). Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 89 percent of the participants served were below the poverty level. The percent of individuals served by the Department of Aging and nine national SCSEP operators in the commonwealth in FY 14-15 who were below the poverty level (89 percent) exceeded the statewide percentage of eligible individuals that are below the poverty level (67 percent).

C. ARE MINORITIES

According to the SCSEP Analysis of Service to Minority Individuals PY 2013, Volume II, April 26, 2015 the minority population in the commonwealth was 24.9 percent. Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 51 percent of the individuals served were minorities, which is more than double the statewide percentage.

D. ARE LIMITED ENGLISH PROFICIENT.

According to data from the U.S. Bureau of Census, 2009-2013 American Community Survey, 5.8 percent of the SCSEP eligible population in the commonwealth did not speak English well or did not speak English at all. Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 7 percent of the individuals served had limited English proficiency. The percent of individuals served by the Department of Aging and nine national SCSEP operators in FY 14-15 who had limited English proficiency (7 percent) exceeds the statewide percentage of eligible individuals who did not speak English very well or did not speak English at all (5.8 percent).

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

One of the Department of Aging's and the nine national SCSEP sponsors six performance goals is serving the most in need. This goal measures the average number of barriers per SCSEP participant. The barriers are: severe disability; frail; age 75 or older; old enough for but not receiving Social Security Title II; severely limited employment prospects and living in an area of persistent unemployment; limited English proficiency; low literacy skills; disability; rural; veterans; low employment prospects; failed to find employment after using WIOA Title I services; homeless; and at risk of homelessness. The total number of barriers divided by the number of participants served provides the average number of barriers per participant. Based on the final FY 14-15 quarterly progress reports for the Department of Aging and the 9 national SCSEP sponsors, 6 of the national sponsors exceeded their most in need goal and the Department of Aging and the other 3 national sponsors met their goal. In the aggregate, the percent of the most in need goal achieved by the Department of Aging and the nine national SCSEP providers was 105 percent.

7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR PARTICIPANTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

SCSEP providers in the commonwealth will ensure the least disruption possible to participants when positions are redistributed or when new Census data becomes available or for any other reason. Participants can never be terminated because of changes in funding, slots, providers or any other reason. If changes are needed, they will be implemented gradually and no participant will be adversely affected. SCSEP grantees in the commonwealth are not permitted to transfer slots from one county to another county or from one county to another state unless there is prior approval from the Department of Aging and the USDOL.

SCSEP ASSURANCES

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

STATE COMMENTS ON SCSEP ASSURANCES

COMMUNITY SERVICES BLOCK GRANT (CSBG)

Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382.

Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

As part of the Combined State Plan,the State CSBG Lead Agency must:

(a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may

(b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

In the work plans that will be authored and submitted by the Community Services Block Grant (CSBG) agencies for the 2016 calendar year of activity, DCED will direct sub–grantees to describe how they will conduct their planning and implementation of workforce activities in collaboration with local workforce development boards. This involvement should include but not be limited to:

• Seeking board and/or committee membership

• Offering/ appointing WIOA representation on eligible entity boards

• Engaging in active information and resource sharing regarding all workforce related activities

• Utilizing existing workforce development and training activities instead of creating or duplicating activities.

Several of our CSBG eligible agencies already provide unique and innovative workforce training and employment related programs. For example:

• Bucks County Opportunity Council provides the Economic Self–sufficiency program which connects and supports individual clients through education and attainment of family sustaining wages. The program is tailored to each individual’s level of need in order to be as impactful as possible.

• Westmoreland Community Action has created a social enterprise to educate clients in basic employment skills, as well as occupation specific skills through its salvage business, Shop Demo Depot.

• Several eligible entities all over the state have partnered to implement an employment initiative targeting veterans. This program uses individual service plans to determine each person’s need and

then provides a host of services, including pre–employment training, job development, paid work experience, and/or subsidized employment, to remove barriers.

• Central Susquehanna Opportunities has initiated the creation of its own employment center when the local PA CareerLink® center moved and created a transportation problem for residents. The center offers job search assistance and hosts numerous recruitment events for area employers.

Plans are being carried out to create two new training programs with corresponding social enterprises:

• Fayette County Community Action Agency is creating a food based manufacturing and distribution center.

• Montgomery County Community Action Development Commission is creating a copying/printing business. Similar to Shop Demo Depot, these programs will train low income individuals in the necessary skills and then employ them to give them experience as well as reinforce basic employability skills.

In addition, the Executive Directive of Community Action, Inc. in Jefferson/Clarion Counties serves in a variety of capacities in workforce development efforts. He is the President of the Punxsutawney Chamber of Commerce, the Treasurer and Finance Committee Chair and on the Executive Committee of the North Central Workforce Development Board (covers Jefferson County) and also serves on the Northwest Workforce Development Board (covers Clarion County) and their Governance and Sector Strategies/Career Pathways Committees.

REINTEGRATION OF EX-OFFENDERS PROGRAM (REXO)

NOTE: PLEASE NOTE THAT THE DEPARTMENT OF LABOR HAS UPDATED THE NAME OF THE REXO PROGRAM. THIS PROGRAM IS NOW THE REENTRY EMPLOYMENT OPPORTUNITIES PROGRAM (REO).

There are no program-specific state planning requirements for RExO. If the state includes RExO in a Combined State Plan, the state must incorporate RExO in its responses to the common planning elements in sections II, III, IV, and V WIOA State Plan requirements instrument.

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Include the State's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

Instructions:Performance Goals for the Core Programs

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the first two years of the plan.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	59.00	65.00	61.00	Baseline
Dislocated Workers	67.00	74.00	69.00	Baseline
Youth	58.00	65.00	59.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	56.00	61.00	57.00	Baseline
Vocational Rehabilitation</	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	58.00	65.00	60.00	Baseline
Dislocated Workers	63.00	75.00	65.00	Baseline
Youth	57.00	57.00	58.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	57.00	62.00	58.00	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	5,000.00	5,000.00	5,300.00	Baseline
Dislocated Workers	6,300.00	7,000.00	6,500.00	Baseline
Youth	2,100.00	Baseline	2,300.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	4,700.00	5,000.00	4,900.00	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	68.00	55.00	69.00	Baseline
Dislocated Workers	71.00	57.00	72.00	Baseline
Youth	60.00	70.00	61.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	48.00	44.00	50.00	46.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	Baseline	Baseline	Baseline	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

TABLE 7. COMBINED FEDERAL PARTNER MEASURES

Measure	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

Trade Adjustment Assistance

Coordination with Other Programs

The commonwealth uses Wagner–Peyser resources for career services and couples those resources with Title I and Trade resources to provide greater choice and focused resources where dislocated workers most need them. Dislocated workers receive all WIOA career services in a comprehensive PA CareerLink® center.

Pennsylvania co–enrolls all Trade–impacted workers in the WIOA program to ensure that all participants receive the full range of assistance available to dislocated workers. Workforce Investment Information Notice (WIIN) No. 14–02 , Guidance on Integrating Services Under the Trade Act Programs—the Trade Adjustment Assistance (TAA) Program, the North American Free Trade Agreement – Transitional Adjustment Assistance (NAFTA–TAA) Program and the Trade Act of 2002 with the Workforce Investment Act provide the commonwealth's policy on integrating services for Trade participants.

The commonwealth implemented an online application for TAA training, job search and relocation allowances, and the Alternative Trade Adjustment Assistance (ATAA) and Reemployment Trade Adjustment Assistance (RTAA) programs. This CWDS module is accessed via the Internet and dislocated workers, PA CareerLink® staff and training providers add information online. PA CareerLink® staff assists Trade–impacted workers with their applications, and assess the workers' skills and experiences.

Use of Funding

The commonwealth will continue to position state merit staff at the local PA CareerLink® centers throughout the state to ensure that eligible Trade participants receive case management services in a timely manner. Funding will continue to be used for system upgrades to CWDS that will allow an integration of services offered by partner agencies. The IEP will also be enhanced to conform to WIOA dual enrollment requirements and avoid duplication of services during the case management process.

Benefit and Service Approvals by Merit Staff

All Trade eligible workers are encouraged to participate in the reemployment services offered through PA CareerLink® offices prior to layoff during their Benefits Rights Interview (BRI). Merit staff are assigned as case managers to assist trade eligible participants through the case management process with a goal of enrolling participants in a Trade approved activity. Merit Staff work closely with WIOA partners to comply with the dual enrollment process. Requests for TAA benefits and services are made by merit staff at the PA CareerLink® centers on behalf of Trade participants via CWDS. Determinations for Trade benefits and services are issued by merit staff located in central office.

Reentry Employment Opportunities Program

Coordination of Services and Activities for Justice–Involved Individuals

Increased collaboration amongst the education, training, workforce development, criminal justice and community–based systems to enhance reentry employment opportunities promotes an effective and efficient government that works. The alignment of reentry planning and service activities among stakeholders can likely improve the justice–involved individual's ability to attain and retain a job that pays family–sustaining wages and to be a productive tax–paying citizen.

Approximately 1 in 28 individuals in Pennsylvania are either incarcerated or under some form of parole/probation supervision. Over 81 percent of the individuals entering the DOC self–report as unskilled or possess no skills and reading levels are slightly below 8th and 9th grades for male and female offenders, respectively. Over 90 percent of the DOC population will ultimately be released and have reintegration needs including employment. Identified as an individual with barriers to employment, ex–offenders also characteristically are basic skills deficient and depict the sub–populations of individuals with disabilities, low–income individuals, individuals receiving public assistance such as SNAP, homeless, older, English language learners, single parents, long–term unemployed, and veterans.

Faith–based and community organizations, as well as local workforce development boards, local workforce service providers and criminal justice system providers that intend to apply to the REO Program solicitations can contact DOC for a letter of support or more formal agreements to support reentry program implementation. The DOC values the applicant's ability to demonstrate an understanding of the criminally–involved population and the criminal justice system as well as the evidence–based practices that support an individual's reentry success and recidivism reduction. DOC will communicate with L&I regarding the requests for support and ensure the proposed program/activities align to WIOA priorities. Similar outreach will occur should L&I receive the request.

The U.S. Department of Labor REO Program awards are provided directly to the applicant and, in the instance a formal collaboration with the DOC has been established, DOC coordinates access to the state offender population and participates in REO programs as agreed upon.

Coordination of services and activities for justice involved individuals to attain and retain employment across the community, workforce and criminal justice systems is critical. However, since most applicants are direct recipients of the grant award, DOC does not partner with all applicants, and there is no formal mechanism established by US DOL to indicate/communicate to DOC or L&I that an REO award is made in Pennsylvania. The DOC proposes a collaborative partnership with the State Department of Labor & Industry via an REO workgroup. The workgroup would be responsible to:

• Outreach and communicate to REO applicants (and potential applicants) on availability of solicitations. • Establish a process to determine formal agreements of support by L&I and DOC for applications, including prioritization for programs/activities that a) align with the WIOA priorities outlined in the State Plan, b) incorporate workforce best practices that achieve successful employment outcomes and c) incorporate criminal justice best practices that achieve successful recidivism reduction outcomes. • Monitor US DOL REO awardee information for Pennsylvania recipients. • Provide technical assistance, where possible and appropriate, to REO recipients in areas such as: designating staff contacts to guide interaction with the workforce and criminal justice systems, establish points of access and processes across the REO program and the workforce and criminal justice systems, identify opportunities to align common intake/referral, identify opportunities to support the identification and tracking of performance for ex–offenders, and other opportunities.

Innovative Employment and Training Programs

Research indicates that employment placement is a vital step in the employment process but it is employment retention that is just one critical factor to address successful reintegration of ex–offenders. When combined with proven strategies to address positive cognitive–behavioral change in the criminally involved individual, employment programs have the greatest ability to achieve successful employment outcomes and recidivism reduction.

Innovative employment and training programs that achieve successful employment and recidivism outcomes incorporate:

1) Recidivism reduction strategies that address cognitive behavioral interventions and other techniques that address criminogenic risk in conjunction with training and employment services; 2) Staff capacity that leverages workforce development, criminal justice and cognitive behavioral intervention techniques such as Motivational Interviewing and the National Institute of Corrections' Reentry Employment Specialist, Offender Workforce Development Specialist, Offender Employment Retention Specialists trainings; 3) Job retention services are needed for approximately 12 months from the date of job placement and incorporate program strategies such as job coaching, intensive case management, and supportive services; and Transitional Work Experiences – such as the Center for Employment Opportunities (CEO) – provide ex–offenders with the much–needed skill development and work experience to support successful employment outcomes. CEO recently launched its evidence–based employment program supporting high risk ex–offenders aged 25 and under in Philadelphia. The program provides comprehensive employment services to men and women with recent criminal convictions. In 2012, CEO released results on its model program via a random assignment evaluation and achieved a statistically significant 22 percent reduction in recidivism for high risk individuals as well as increased employment placements. CEO is currently undergoing another more recent rigorous third–party evaluation to evaluate job retention and other employment outcomes.

Sector Strategies and Workforce Intermediaries

The commonwealth will use sector strategies as its major means of linking workforce development and economic development. The U.S. Department of Labor (USDOL) defines Sector Strategies as industry–focused approaches to workforce and economic development that improve access to good jobs and increase job quality in ways that strengthen an industry's workforce. USDOL is actively promoting sector strategies as "a proven framework" that WIOA incorporates into state and regional planning requirements. This new federal emphasis on sector–based workforce development strategies signals an important opportunity for Pennsylvania.

Since shortly after the implementation of the 1998 Workforce Investment Act, Pennsylvania has been a leader in making sector–based approaches integral to its design and delivery of workforce services for employers and workers. Over the past decade, more than 100,000 Pennsylvanians have participated in training programs sponsored by Pennsylvania's employer–driven Industry Partnerships. This record of success has led to bipartisan support in Harrisburg and in 2011 state legislators unanimously voted to put the commonwealth's Industry Partnership program into statute. Pennsylvania has also implemented sector strategies through multi–employer apprenticeship programs, which are strongest in the construction industry. However, Pennsylvania also has longstanding and innovative manufacturing apprenticeship programs that touch multiple employers. Some of these are legally single–employer apprenticeships in which classroom education and other

apprenticeship elements are coordinated for multiple employers by an industry association or non–profit intermediary.

Given the potential of robust Industry Partnerships and other multi–employer workforce intermediaries to solve coordination problems in the labor market and improve outcomes for employers, workers, and regional economies, Pennsylvania aims under WIOA to go well beyond its sectoral initiatives to date. Pennsylvania also plans a flexible and non–bureaucratic approach to supporting sector strategies and sectoral workforce partnerships. Thus, while Pennsylvania's largest–scale recent sector initiative has been the state's Industry Partnership program, the state does not see this program as another new workforce silo but rather as a flexible program that should be responsive to the shifting workforce needs of groups of employers in each sector. The program has been managed flexibly to date, with a variety of entities – industry associations, economic development organizations, non–profit organizations, LWDBs and labor–management organizations – managing partnerships in different sectors and regions of the state. Looking forward, the state plans a performance–based approach to strengthen effective multi–employer workforce partnerships that demonstrate the ability to improve workforce outcomes for all stakeholders in their sector.

Pennsylvania also seeks to strengthen the role of sectoral partnerships as coordinating entities on the full range of workforce issues, not just incumbent worker training. Industry Partnerships were funded initially to deliver incumbent worker training because that was where employers saw the biggest gaps. In practice, however, Pennsylvania's Industry Partnerships have also addressed common workforce challenges related to entry–level workers, the recruitment of low–income and other targeted groups, and even, on occasion, the reemployment of dislocated workers. Apprenticeship programs, the oldest and best funded sectoral workforce partnerships in Pennsylvania (reliant mostly on private funds), are often thought of primarily as training new workers. However, they also serve a wide range of coordinating functions for their employers: incumbent worker training, supervisory training, sophisticated safety training and, in some cases, pre–apprenticeship programs for in–school and out–of–school youth, sometimes with community based partners. Some education and training programs operated by schools and academic institutions also deserve support because they meet the criteria for effective sectoral workforce partnerships: they have deep engagement of employers in a sector (e.g. York College's engineering programs serving local manufacturers) that keeps curriculum current, expands work–based learning (e.g., internships and summer jobs), leads to industry certification as well as academic credit and results in careers for young people and great employees for Pennsylvania's high–wage companies.

Going forward, Pennsylvania will invest in sectoral workforce intermediaries that:

• Can serve as general–purpose employer–engagement partners for programs dealing with all workforce groups, including high–school and out–of–school youth, college students, dislocated and other unemployed workers, veterans, low–income workers, TANF recipients, persons with disabilities, and ex–offenders re–entering the workforce, as well as incumbent workers who are not included in any of these categories.

• Are well– and sustainably funded by a mix of private and public funds.

• Are effectively run, with a large and demonstrable impact on outcomes for employers, for individuals receiving services, and for all Pennsylvanians because they increase productivity, competitiveness, and the number of jobs that pay.

To accomplish these goals, Pennsylvania will:

• Expand state and LWDB support for Industry Partnerships, multi–employer apprenticeships, and other sectoral workforce intermediaries. Pennsylvania state appropriations for Industry Partnerships went from $20 million in fiscal year 2008–09 to less than $2 million since fiscal year 2011–12. State discretionary and American Recovery and Reinvestment Act (ARRA) funds were used to further augment support for IPs through 2011 and 2012. Starting in 2016, Pennsylvania may use some of its WIOA state discretionary dollars for IPs, multi–employer apprenticeships, and other multi–employer workforce intermediaries.

• Seek sustainable public–private support for workforce intermediaries. Building powerful effective Industry Partnerships and other sectoral workforce intermediaries requires supplementing annual state appropriations with funding sources that are not dependent on the state budget process. The commonwealth will explore several possible sources.

• Leverage local, federal and philanthropic funds for workforce development, including sector strategies, career pathways and innovative youth programs. Pennsylvania's governor has a long history of civic engagement in which he learned the importance of building partnerships and leveraging resources from many funding sources to get a project completed or the job done right. Pennsylvania's workforce system also has more experience than that of any other state in the past decade in leveraging philanthropic funds (e.g., from the National Fund for Workforce Solutions) to ensure that low–income and other priority populations, as well as employers, benefit from sectoral partnerships. Pennsylvania will pursue partnerships and funding from nonprofit foundations, local governments, and the federal government to make state tax dollars stretch further. To kick–start philanthropic interest in the reinvigoration of workforce partnerships, Pennsylvania will organize a "Governor's Convening with Philanthropy" in 2016 and make workforce development a core component of this event.

• Seek funding for workforce partnerships from multiple agencies. To date, Pennsylvania's Industry Partnership and apprenticeship programs connect to state government through the Department of Labor & Industry. As the USDOL definition of sector strategies makes explicit, however, sectoral approaches make sense for economic development as well as workforce development. Sector strategies are also an effective way to serve a variety of constituencies who are primarily under the purview of other state agencies: young people (Department of Education), TANF and SNAP recipients (Department of Human Services), employers (Department of Community and Economic Development), farmers and agricultural workers (Department of Agriculture), ex–offenders (Department of Corrections), and older individuals (Department of Aging). The fact that effective sector strategies require cooperation across many agencies is further reflected in Pennsylvania's Industry Partnership statute. Pennsylvania will encourage funding of sector partnerships by multiple agencies.

• In partnership with sectoral intermediaries and LWDBs, develop and implement a comprehensive sector partnership performance management and continuous improvement system. Beginning in 2005–06, Pennsylvania developed a multi–pronged performance management system for Industry Partnerships that included required annual reports from Industry Partnerships, tracking of wage and placement outcomes from individuals trained with Industry Partnership dollars, and a program of training and capacity building for Industry Partnerships. The latter included the "PA Sector Academy," sector–specific peer learning opportunities, and, in the case of health care and manufacturing, compilation of Industry Partnership best–practice toolkits. While cutbacks in Industry Partnership funding have slowed its development, Pennsylvania will reinvigorate this performance management system, with appropriate fine–tuning to include apprenticeships and multi–employer, sector–specific pipeline programs for youth.

This accountability system should be a tool that provides an ongoing feedback loop to sector partnerships and their coordinators and supports peer learning and practitioner–state dialogue about “what are we trying to do?” and “is it working?” This system should also be used to help more sector partnerships undertake higher–order initiatives with high net benefits for employers, workers and job seekers, and the state. Such initiatives may include spreading best practices, developing industrywide credential and career pathway systems, creating industry–specific job matching systems that help dislocated workers with industry–specific skills (e.g., precision machining and industrial maintenance in manufacturing) find reemployment, or managing programs that help people from targeted groups access careers that pay and obtain the skills and attitudes needed to succeed in well–managed companies.

Components of an enhanced sector partnership performance management system could include:

o Sector partnership standards that spell out explicitly the full range of activities in which a high–performance multi–employer workforce partnership can engage. For example, Pennsylvania’s Notice of Grant Availability for the 2015–16 Industry Partnership program did this.

o A revitalized program of capacity–building and peer learning for Industry Partnership coordinators and interested employer members, with varied offerings for new coordinators, those with some experience (e.g., PA Sector Academy), and experienced practitioners (e.g., self–directed peer learning with technical assistance from national experts).

o An explicit and public proposal–scoring system for Industry Partnership proposals that allows the state to encourage high priority activities with a high return.

o A modified Industry Partnership Annual Report that balances the goal of making the report short and easy to complete quickly with the goal of making it a more powerful tool for supporting Industry Partnerships to take on initiatives with greater potential to improve outcomes for both employers and workers/job seekers.

o Collection of quantitative performance data from partnerships, with quick–turnaround access to data for the partnerships, including how they compare with their peers.

o Competitive grants to multiple Industry Partnerships in a specific cluster (e.g., advanced manufacturing, health care, logistics and transportation) that agree jointly to develop and use sector–specific benchmarking tools that track the impacts of strategic workforce investments on employer outcomes. (Outcomes might include turnover in long–term care, scrap rates and uptime in manufacturing, and on–time delivery in logistics and transportation.) These tools would be another way to encourage sector partnerships to tackle higher–order organizational improvement issues with a potential to increase the return on investment.

o Develop a certification process for Sector Partnerships. Businesses often use organizational certifications, such as ISO standards, as tools for improving organizational performance. Workforce intermediaries could similarly benefit from a certification process. Certification might be particularly valuable to improve partnership governance, e.g., by making partnerships more employer–driven and less staff–dependent. Certifying partnerships would also open up the possibility of using certification as the basis for eligibility for partnerships to qualify for additional or continued state funding.

Public Comments and Responses

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

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

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

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

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

AHEDD offered multiple comments to include:

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

Response: We appreciate the overall sentiment.

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

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

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

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

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

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

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

Response: WIOA strengthens the foundation for the establishment of a comprehensive, accessible, and high–quality workforce development system that serves all individuals in need of education and employment services, including individuals with disabilities, and employers in a manner that is

customer–focused and that supports an integrated service delivery model. In addition to the indicators of performance for activities provided by the core programs, Title IV of the Rehab Act Section 414 State Plan requires the number of individuals referred to State VR programs (OVR) by one–stop operators (as defined in section 3 of WIOA), and the number of individuals referred to such one–stop operators by State VR programs. The CWDS tracking and reporting of individuals referred and served by these programs will help identify areas of need for improved collaboration to adequately serve individuals with disabilities through the PA CareerLink® system.

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

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

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

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

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

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

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

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

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

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

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

Response: We appreciate the comment.

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

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

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

Response: The Allegheny County program served 400 youth.

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

Response: We appreciate the comment.

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

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

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

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

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

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

• Page 84– Very specific and thoughtful strategies for reaching OSY.

Response: We appreciate the comment.

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

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

• Page 120– Coordination with Employers– “Where possible, OVR will coordinate business outreach with other workforce and economic development partners, including Industry Partnerships and other multi–employer workforce partnerships.” This is a prime place to plan for partnership with the PA Business Leadership Network, Chambers, SHRMs, and other possible business organizations. We would love to see flexibility and ease for such business organizations to receive grants for such business–to–business outreach and program implementation.

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

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

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

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

Response: We appreciate the comment.

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

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

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

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

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

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

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

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

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

Response: We agree and appreciate the comment.

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

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

Fred Orozco of Armstrong Educational Trust offered the following comments:

• Page 39–44 Alignment with Other Partner Programs

The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.

• OR / AND Page 51–53 Leveraging Resources to Increase Educational Access

The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.

• OR/AND Page 53 under the heading Improving Access to Postsecondary Credentials

The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

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

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

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

services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

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

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

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

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

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

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

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

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

seeking occupational certifications can use the public computers for online classes and have their exams proctored at the Library.

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

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

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

Thank you for considering my comment.

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

Barber National Institute offered the following comments:

• We would like to commend to authors of the draft WIOA State Plan for their vision and thoroughness in developing this document. Clearly, every effort has been made to provide a path to address the workforce needs of the Commonwealth well into the future. It appears that all of the potential stakeholders, from government at all levels, not for profits and the business community, will be communicating and coordinating efforts to make this plan a reality for the citizens of the Commonwealth.

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

o The development of Career Pathways with identification of high priority occupations along with jobs that pay family sustaining wages and the development of quality entry level jobs.

o The establishment of Employment First when developing individual plans for service for persons with an intellectual disability.

o The development of micro credentials and apprenticeship programs for persons with a disability.

o The establishment of the DREAM Partnership which will provide College Based Certificate programs for young adults with an intellectual disability.

o OVR collaboration with employers to develop work based learning experiences for persons with an intellectual disability.

o OVR's continued evaluation of the Early Reach program which seeks to assist youth with disabilities in transition planning while still in school.

o Update of the IDEA Memorandum of Understanding and Transition Policy for Pennsylvania.

o Development of an Individualized Plan for Employment (IPE) before students with disabilities graduate or exit high school.

o The continuation of Letters of Understanding (LOU) with not for profit entities that provide services for persons with disabilities.

o Additional OVR Counselor recruitment and a plan for a comprehensive system of staff development and training.

o The development of a Statewide Assessment to focus on the rehabilitation needs of persons with the most significant disabilities including their need for supported employment services.

o The establishment of State Goals and Priorities which are to provide an increase in employment opportunities for individuals with disabilities and to increase/improve Transition Services for students with disabilities.

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

• The following items are areas we would like to assure are emphasized to a further degree:

o Increased interagency collaboration, specifically ID providers who have extensive programming currently in place which could offer transition services for youth.

o While innovative new programs are needed, successful legacy programs should be explored which would result in an increased number of resources available to support the overarching goal of community employment for both youth and the older population. Programs exist which are very successful at supporting the development of hard and soft skills and maintaining acquired skills while providing minimum wage pay and outcomes of community integrated employment. Agencies also have programs for adults which teach independent living skills and supports beyond employment.

o OVR is not currently accessing established providers of Intellectual Disability services who have information on individuals that have been referred to OVR for eligibility determination. A process and increased collaboration is desperately needed to ensure enough information is available to the VR counselor to make determinations on eligibility.

o The plan addresses the need and recruitment efforts for VR counselors. A maximum caseload should be established, well below the current number so that counselors have adequate time to support individuals and participate in the employment process with the team.

o The commonwealth is focusing on training for human resources within the business outreach plan. It would be beneficial to expand this training to business persons directly responsible for hiring. Often there is a gap between corporate policy and district/ local management. Training needs to include specifics related to liability and the positive, current workforce statistics for those with

intellectual disability. In addition to encouraging employers to participate in business–education partnerships, it would be beneficial to encourage business–provider partnerships.

o It would benefit the Intellectual Disability population and overarching goal of employment if the commonwealth would establish greater opportunities for post–secondary career and technical education beyond ABE specific to individuals with Intellectual Disabilities and/or most significantly disabled. Consideration for Supported Education to achieve degree or certifications is needed.

o The time between referral to OVR and eligibility acceptance or denial should be thirty (30) days.

o Specific documentation of the end of the last phase of OVR contract should be created and shared with the team within enough time to allow the support coordination unit to secure waiver funding for an individual that continues to need some job coaching supports after the OVR phase has been completed. Gaps in funding for providers of supported employment services currently occur due to lack of coordination between OVR, ODP, County's SCO, and providers.

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

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

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

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

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

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will

make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

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

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

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

The “Employment First” initiative is commendable in supporting competitive employment as a choice for individuals with disabilities. BCRC has promoted and placed individuals in competitive community employment for over 50 years. However, we need to protect and expand job opportunities for those with significant disabilities, including employment in sheltered workshops instead of focusing on eliminating them. I believe that any recommendations on the elimination or phase out of sheltered workshops and Fair Labor Standards Act (FLSA) 14(c) Certificate Programs are flawed because of the lack of data of what happens to individuals with disabilities in communities where these programs have been shut down, and there has been limited study of how many individuals are transitioned out of employment and into day habilitation programs as a result of ending the programs.

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

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

Don’t deny those with a disability the same opportunity of choice you and I have had the right to exercise in our employment. This is not a one–size–fits–all solution.Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. The provisions in section 511 are effective 2 years after WIOA enactment, specifically, July 22, 2016. Section 511 demonstrates the intent that individuals with disabilities, especially youth with disabilities, must be afforded a full opportunity to prepare for, obtain, maintain, advance in, or reenter competitive integrated employment. The WIOA State Plan does not include any provision to "eliminate" the FLSA 14c certificate program. Rather, new requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate. David Dudo of Beemac Trucking offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth’s workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area’s federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today’s increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Susan Lopez from Boyertown Community Library offered the following comment: After reading through the first section of the Workforce Innovation and Opportunity Act, I recognized immediately that public libraries could play a major role in helping the goals of this proposal become a reality. Public libraries are a place where many adults

already come to search for jobs and to prepare resumes. Libraries, provided they have the staff, meeting space and technology, could be a place where classes for adults and older youth could be held. Classes for the following skills could be included: basic literacy, computer skills, financial management, application, resume writing and interview skills, and networking. This truly is a tremendous opportunity for libraries to show their value! Response: We appreciate the comments about how libraries assist jobseekers with basic computer skills, access to the Internet, and access to educational resources and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. Jennifer Johnson from Brandywine Heights High School offered the following comment: High School students are the future of our workforce and who better to help them attain skills that employers look for are libraries & librarians. In high school we instruct & guide student how to find & process/ analyze (good) information, how to use that information by planning, organizing & prioritizing it, and time management skills. All of these skills are highly sought after by both employers & colleges. This is why high school libraries should be included & funded in this plan. There is no other place that every young adult has access to. Response: PDE appreciates the support of the comment for high school libraries and librarians. However, it is noted that current Pennsylvania law does not require school districts to provide library services; this choice is left to determination at the local level. PDE also notes that WIOA does not provide funds for education services for the general student population. WIOA focuses specifically on youth with barriers to employment. Bucks County Community College offered the following comment: This plan does not appear to be in the best interest of post–secondary institutions like Bucks County Community College. At first glance, it appears that our essential Perkins funding could possibly be decreased as a result of changes proposed in this plan and that expectations for Perkin's goals should perhaps be more clearly defined. Response: At this time, the US Department of Education has not provided guidance and the Pennsylvania Department of Education is not able to provide guidance on expectations. WIOA regulation is clear that federal Perkins regulations must be met and the required uses of funds must be met. To the extent that Perkins is a program partner in the Combined Plan, there will be additional reporting requirements and assurances that Perkins recipients must meet. Bucks County Workforce Development Board offered the following comments: • On behalf of the Bucks County Workforce Development Board, the following considerations are submitted as comments on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Draft for Public Comment, dated December 28, 2015. The Bucks County Workforce Development Board discussed the Draft State Plan at its January Board of Director meeting. Generally speaking, the Board notes that the Plan appears job–seeker–centric as opposed to employer–centric. We believe the success of the public workforce system resides in the development, at a local level, of a system responsive to the needs of our employer community. Additionally, there are concerns relative to the prescriptive nature of the Plan; there appears to be a lack of autonomy at a local level to provide creative and innovative solutions to local economic and workforce challenges. Comment: We agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. While we agree that local flexibility is important, the State Plan must also be prescriptive at times to ensure the Governor's priorities are achieved. • Section 2.4 notes that incumbent worker training is available through WEDnetPA and Industry Partnership funding opportunities; these funds are through state budget appropriations and are competitive. Not all local areas consistently benefit from these sources. The WIOA legislation clearly notes incumbent worker training may be conducted through WIOA; this option of funding is not addressed in the State's Plan. We believe a successful local economy is created through its skilled incumbent workforce and request that incumbent worker training through formula funding be specifically articulated. Comment: We appreciate the comment and note that the commonwealth is drafting that will address the use of WIOA funds for incumbent worker training. • We applaud the development of the Office of Apprenticeship Training and look forward to an increase in pre–apprenticeship and apprenticeship training opportunities with our

partner CTEs, Bucks County Technical High School, Middle Bucks Institute of Technology, and Upper Bucks County Technical School, and the Bucks County Community College. We respectfully request that the definition of training be broadened in the State Plan to include training opportunities outside of traditional ITA and OJT opportunities, including paid internships, pre–vocational, entrepreneurial, paid work experience, and short–term training offered by educational institutions not on the Eligible Training Providers List. Comment: We do not believe the State Plan in any way limits training to only ITAs and OJTs. The commonwealth will be issuing guidance in the near future to include a definition of training, which will include multiple types of training beyond ITAs and OJTs. • The training benchmarks in Section 2.1 specify the incremental benchmarks for investment of Title I funding, but fails to include alternate sources for training funds that should be included in the overall benchmark. We respectfully suggest the definition of training is articulated as it is in WIOA Section 134. Our general concern related to this section is the prescriptive nature of this requirement and the inability for a local area to invest and steward the public dollars as it makes sense in that local area. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. Butler County Community College offered the following comments: • OJT and apprenticeship opportunities should be stressed and financially supported by the Commonwealth. This should be coordinated with efforts such as WEDnet, industry partnerships and newly proposed micro credentials offered by the community colleges and other training providers. Response: The commonwealth will continue to promote and support apprenticeship opportunities through the newly–established Office of Apprenticeship and will provide financial support to both traditional and non–traditional apprenticeship opportunities, including pre–apprenticeship, through grant funds, Industry Partnerships and other discretionary funding. • A goal of the plan should be a single–point of entry; one that utilizes the Commonwealth's 14 community colleges as much as possible. The state plan defines "career pathways" on page 243. The community colleges are the ideal entry point on a career pathway, as they offer ABE/GED, Keystone Education Yields Success (KEYS), workforce development training, certificates and associate degrees. Response: The commonwealth disagrees that there should be a single point of entry into the system. There are numerous populations to be served and very different ways of serving them. There is not a "one–size–fits all" solution to serving both the job seeker and employer customers we are required to serve. We do agree that community colleges are an important partner in service delivery and will consider ways to better utilize the community colleges across the commonwealth. • Community Colleges should be represented on all WIOA boards, and there should be a designated spot on the state board for a community college president representing the PA Commission for Community Colleges. Response: The Workforce Innovation and Opportunity Act does not require the appointment of community college officials to the state board, although it does allow for it. The members of the Pennsylvania Workforce Development Board (State Board) are appointed by the Governor. While not required, we note that there are currently two community college representatives on the state board, one of which is a community college president. WIOA Section 107(b)(2)(C)(ii), pertaining to local board composition states each local board "shall include a representative of institutions of higher education providing workforce investment activities (including community colleges)." The commonwealth must certify local board composition to ensure all required entities are appointed. • This is in regard to community college opportunities in rural areas referenced on page 21. Butler County Community College welcomes the new opportunities provided by the Workforce Innovation and Opportunity Act. As such, the college is eager to share experiences which reflect high levels of innovation. One such opportunity appears to be expansion to areas not served by a community college. On Page 21 of the plan, it is noted that there is a lack of community college opportunities in rural areas. The college wishes to share the efforts that have been made to address this issue. Butler County Community College has been actively and aggressively serving outlying areas of the Commonwealth since 1982. The college has partnered with many local and regional entities to ensure access to post–secondary education in these areas. The college expanded to Armstrong County in 1982, Lawrence

County in 1989, and Mercer County in 1997. Most recently, the college began offering services in Jefferson, Clearfield, Elk and Clarion Counties in 2010. Buildings have recently been built in Lawrence, Mercer, Brockway and Armstrong in order to provide a broader footprint with greater student services. Today approximately 700 students from these outlying areas attend BC3. Again, the college embraces its role as an active partner in workforce and economic development and looks forward to joint opportunities in the future. Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to their residents. Dennis Frampton of C&J Industries, Inc. offered the following comments: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services

(p. 24–25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We thank you for your thoughtful comment on the use of high– and low–quality terminology and the resulting subjective interpretations. We recognize that some low–wage jobs are or can be part of a career pathway that leads to better jobs, and we will consider the former as a route to high–quality employment. Stakeholder input is valued as we move towards a more universal and common WIOA language. We agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. Susan Banks of the Carnegie Library of Pittsburgh offered the following comments: • In general, the plan would benefit from the explicit inclusion of public libraries as intrinsic and important partners in the effort to build the workforce of the future in Pennsylvania. For many years, public libraries like the Carnegie Library of Pittsburgh in communities large and small have successfully provided programs and services to support economic and workforce development. Public libraries are central to the success of job seekers, businesses seeking skilled workers and residents of our communities who seek support during transitional times in their lives for which there is precious little infrastructure. Public libraries are consistent and dependable partners with their local workforce development boards and have

maintained accessible services to populations in need – in many cases since public libraries were established. Specifically, in each goal area, there are aspects of the planned activities that align completely with public libraries' missions and most of their practices, and as such would benefit from the inclusion of public libraries as named entities. In Goal 1, libraries frequently address and support the development of basic literacy skills for adults and provide the entry point for job seekers with barriers to mainstream career pathways. Response: We appreciate your comments related to libraries and the role they play in developing the workforce for the future and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. • In Goal 2, libraries provide the space and technology to support both the individuals and the organizations listed in several of the strategies. We work closely with our local workforce development boards and many libraries supplement the services of their LWDB. Response: We appreciate the comments about the technology and space available in libraries to develop a strong workforce. • As described in Goal 3, library services and outreach specifically to out–of–school youth are growing and thriving in communities of every size. Supporting and guiding this population in transition is an emerging field of study and service in the library field, as well, and it would benefit every player in this plan to take advantage of the insights and existing structures that link to and serve those youth in preparing them for a successful transition to adulthood. Response: We appreciate the comments about libraries' support of out–of–school youth. • In Goals 4 and 5, libraries have made robust connections with the business and corporate communities to link the job seekers to those seeking quality workers. Public libraries often serve as aggregators and providers of access to local data that can create a shared platform for understanding the evolving nature of each community as well as rich insight into the needs of specific populations to help in decision–making and service design. In conclusion, I urge you to explore the roles that public libraries can and should play in supporting and, in some cases, leading the work outlined in this plan. Public libraries already do this work and act as meaningful partners in pursuing many of the objectives listed. Response: We appreciate your comments about the library's role as an aggregator of data and convener of groups to better understand workforce trends for your community. The Center for Employment Opportunities offered the following comments: • On behalf of the Center for Employment Opportunities and the individuals we serve, I thank Governor Wolf and the state agencies collaborating to develop the draft Pennsylvania's WIOA Plan. The draft plan represents a comprehensive and innovative effort to build an effective and more aligned workforce system across the state. Pennsylvania's WIOA Plan presents the state with a unique opportunity to improve the delivery of workforce development programming and services in a manner that meaningfully addresses the training and employment challenges of our highest need communities. Including the following considerations in the state plan will ultimately maximize education and employment outcomes for the state, boost our economy and support a future of shared prosperity. As an organization working to increase access to opportunity for individuals with convictions, we believe WIOA's prioritization on individuals with barriers to employment offers an excellent opportunity to provide individuals with criminal convictions at highest risk of recidivism the skills and resources necessary to succeed in work while supporting themselves and their families. Response: We appreciate the comment in support of our efforts. • Today there are approximately 360,000 people in Pennsylvania who are either incarcerated or on correctional supervision – costing the state over $2 billion annually. Each year tens of thousands of men and women return home to from jail and prison to Pennsylvania communities. These individuals' criminal convictions carry an additional barrier to employment along with other barriers many Americans face. The unemployment rate for recently released individuals is between 60–70% due to significant barriers in access to jobs upon release. Furthermore, a history of incarceration reduces an individual's hourly earnings by 11% and annual earnings by 40% for their entire work history. Employment has been shown to make communities safer and to decrease criminal justice recidivism, especially among individuals who are most at risk of returning to incarceration. For example, CEO transitional work and vocational programs have shown statistically significant reductions on all measures of recidivism with an over 20% reduction in reconviction and returns to incarceration with program participants. CEO's program

also saves taxpayers up to $3.30 for every dollar spent, or $8,336 saved per person. CEO's success is even more pronounced when serving young adults and those at highest risk of recidivism. Organizations such as CEO can serve as key partners with local Workforce Investment Boards to ensure they fulfill WIOA's requirements to serve adults receiving public assistance, other low–income individuals, and individuals who are basic–skills deficient. Response: We appreciate the comment and encourage organizations like CEO to partner with Local Workforce Development Boards. • Given our experience working with this population, CEO sees several clear strengths in Pennsylvania's WOIA plan, including: o Inclusion of formerly incarcerated individuals (or "ex–offenders") among the prioritized population of people with high barriers to employment o An emphasis on and dedicated funding for programs serving out–of–school youth and young adults o Dedicated funding (20% of youth funds) to provide young adults with high quality work experience o Dedicated funding by Local Workforce Development Boards (LWDB) and CareerLink Centers (5–10% of funds) for transitional work opportunities for priority populations. o Inclusion of transitional work programming on the list of eligible training opportunities and a prioritization of those training opportunities to serve populations with barriers to employment o Specific emphasis on the importance of workforce opportunities to the successful reintegration of formerly incarcerated individuals, including a focus on evidence–based models such as CEO's transitional work program, motivational interviewing, CBT practices, and employment retention services. Response: We appreciate the comment in support of numerous aspects of the plan. • Additionally, CEO believes that with four additions to the plan, the State can more deeply encourage local Workforce Investment Boards to better serve residents with past convictions and enable their long–term success in the workforce. These changes include: o Provide specific funding guidance to support formerly incarcerated individuals: While Pennsylvania's WIOA plan provides excellent guidance in encouraging local WIBs to serve men and women with past convictions, CEO recommends dedicating specific funding to this population. Formerly incarcerated individuals are among the most difficult people to employ, but their success in the workforce has among the best social and economic outcomes for the State — including increased public safety, lower corrections costs, and increased stability in some of the most challenged communities in the state. Without a direct funding requirement dedicated to this population, the State risks formerly incarcerated individuals being left out of the workforce system and funding instead supporting sub–populations with lower barriers. Response: We appreciate the comment and will take it under advisement. o Loosen wage expectations for the highest risk populations: CEO has learned through 20+ years of service to populations with the highest barriers to work that access to the workforce, successful development of workplace habits and norms, and long–term job retention are equally as important to young adults and men and women with the highest barriers to employment as the wages they earn. By loosening wage expectations specifically on these populations, and enabling local WIBs the flexibility to place high–risk populations into the labor market without affecting their overall wage goals, the State can encourage services to this population and ensure that all Pennsylvanians who want to work have a starting point to enter the labor market. Response: We appreciate the comment and note that WIOA presents many new performance measures and goals. For many populations, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. We also recognize some subjectiveness in the term "high–quality jobs" in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. o Define "Transitional Jobs" to ensure high quality experiences for participants: CEO applauds the State's strong prioritization of transitional work as a key driver of successful employment, but suggests Pennsylvania provide a clear definition of transitional jobs, reflecting the federal WIOA legislation, that ensures fidelity to proven approaches. By definition, transitional jobs are: o time–limited work experiences that are subsidized and are in the public, private, or nonprofit sectors for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history; o

combined with comprehensive employment and supportive services; and o designed to assist individuals to establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment. In addition, CEO believes the highest quality transitional jobs include a team–based approach and active, consistent supervision. Response: We appreciate the comment and plan to provide further guidance and definition on training, including transitional jobs, in future policy. • Provide specific training funds for transitional work: With 30% of overall funds dedicated to training, PA has an opportunity to ensure men and women are receiving employment–based training that builds workplace habits and develops skills. Transitional employment encourages consistent program participation by combining income and training and ensures participants are learning skills demanded by real employers. CEO believes the State can go even further than including transitional work as an eligible training activity, by requiring that a percentage of training funds be spent on programs that provide real paid work experience in addition to training. Response: We appreciate the comment and note that the plan requires Local Workforce Development Boards to use between 5 and 10 percent of their funds on transitional jobs. The Centers for Independent Living commented: Under the section Alignment with Other Partner Programs it make mention of the many other partners that provide services and support to persons with disabilities and seniors. In particular, on page 41 it even names the PA Links to Aging and Disability Resources (PA Links) as a resource for elderly Pennsylvanians and adults with disabilities. Recommendation – It is important to know that the 18 PA Centers for Independent Living (CILs) have been in establishment much longer then PA Links, but are not stated as a partner. CILs have for many years provided services and supports to seniors and adults with diverse disabilities and should be included as one of the stated partners in the Pennsylvania's WIOA Combined State Plan! Response: We agree that the Centers for Independent Living (CILs) are a valuable partner and have added the CILs to the section on Alignment with Other Partner Programs on page 41–42 of the final State Plan. Jane Irwin of the Central Penn Institute of Science and Technology commented: I am the fiscal agent for a consortium of six Practical Nursing Programs that participate in Perkins Funding. Our small programs benefit greatly from Perkins funds utilizing those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from the Perkins grant allow our programs to provide a quality education to those who will serve the health need of Pennsylvania's citizens. The WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Careel Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate any feedback regarding this proposal as it is available, as the potential impact to our nursing programs could be very detrimental. Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over $2,000 as a result of this alignment. With a decrease of $10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in–kind or funds. The Central Pennsylvania Workforce Development Corporation made the following comments: • Thank you for the opportunity to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the

period July 1, 2016 through June 30, 2020. As a Local Workforce Development Board representing the largest geographical workforce development area in Pennsylvania, we offer comments to aid the Commonwealth in meeting the goals and objectives outlined in the plan based on the experience and knowledge of local workforce development, economic development, and education professionals, private sector volunteers, and local elected officials within Central Pennsylvania. The Central Pennsylvania Workforce Development Corporation (CPWDC) offers recommendations or seeks clarification on the plan as outlined below. Response: We appreciate the feedback. • Training Benchmarks (PA WIOA Plan 2.1, p. 10): CPWDC has taken multiple steps to encourage individuals to enter formal training including increasing the amount an individual or business can receive for an individual training account (ITA) (increased from $6,000 to $9,000) and on–the–job training reimbursement (removed $6,000 cap) which doubled the number of customers entering training from program year (PY) 2013 to PY 2014 and 2015; however, budgeted training funds still remained unspent at the end of the year. During PY 2014 and PY 2015, CPWDC's total training budget in comparison to the WIA/WIOA Title I allocations were 36% and 21%, respectively. CPWDC's experience has shown us that making it easier for jobseekers to enter training and increasing the amount paid per jobseeker will increase the number of individuals enrolling in training; however many customers have other barriers that need addressed before they can enter training and be successful, or they need to find employment as soon possible and can't wait for formal training regardless of the amount of training money available to them. As a result of the 50% minimum training expenditure requirement for Title I, local boards could train the same number or less people than we already serve to the detriment of individuals and businesses receiving other services at the PA CareerLink®, high schools, and other locations that are not currently categorized as training. The minimum training expenditure threshold for the Central Workforce Development Board based on the PY 2015 budgets would reduce Title I funding for PA CareerLink® operations including staff and infrastructure, business services, our year–round in–school youth career coaching program, and workforce development board operations by $1.5 million annually. CPWDC makes the following recommendations and seeks clarification in regards to the minimum training thresholds. o As written, the minimum training thresholds apply to all Title I programs (i.e. Adult, Dislocated Worker, and Youth); however, eligibility for dislocated workers is not based upon barriers. Also, youth must have a legislative barrier to enroll in WIOA programs and WIOA includes a 20% training requirement for youth. As such, we request that Title I Dislocated Worker and Youth programs be excluded from the training requirements. o Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures mirroring the WIOA formula to determine the 75% out–of–school youth minimum expenditure requirement. o Include all allowable training activities under WIOA section 134 as well as paid work experience, internships, training offered by Title I staff, the cost of assessment and case management necessary for participants to enroll in and successfully complete training. o Include support services and needs related payments necessary to complete training towards the training expenditure requirement. o Include training conducted under all other local, state, and federal funding including but not limited to Rapid Response, National Dislocated Worker, H–1B, Jobs Accelerator, and other grant programs to offset the training target. o Include PELL, scholarships and other forms of financial aid to offset the Title I training target. Low–income individuals are often eligible for PELL grants reducing or eliminating the need for WIOA funds based on training costs. o Include one–stop partner program training expenditures for participants dual enrolled in the one–stop partner program and WIOA including Adult Basic Education, Trade Act, etc. o It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures. Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We have also clarified that administrative funds do not apply when establishing training benchmarks. A policy will be issued in the near future that will define "training" for purposes of the targets. The policy will provide a process for local areas to request that additional training types and models count

toward meeting the targets. • CPWDC recommends that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below. o Exclude dislocated workers from the calculation as their eligibility is not based upon barriers. o Include the barriers identified in the local boards' priority of service policies, including but not limited to not earning a "self–sufficient" wage towards the training targets. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas in meeting the targets. A policy will be issued in the near future to further clarify the training benchmark requirements. • Priority of Service (PA WIOA Plan p. 67): CPWDC agrees that priority of service (POS) should be given to individuals with barriers. By implementing a high priority of service requirement of 70% of participants served, this could leave a large portion of low–income individuals underserved by the public system. In PY 2014, CPWDC served 2,589 WIOA participants, of which approximately 15% met the priority of service definition. CPWDC would have needed to turn away over 1,400 WIOA participants to meet the 70% threshold. Many of these participants, while not POS are part of the working poor that came to the PA CareerLink® to improve their skills and find better employment. There are also concerns that publicly posting priority of service information may not be in the best of interest of the jobseeker customer or the PA CareerLink® as it serves businesses based on the stigmas associated with meeting priority of service. Businesses want to know we will work with the best candidates available to meet their needs, regardless of the jobseeker's status when enrolling in WIOA programs. Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to "priority of service": o Exclude dislocated workers as their eligibility is not based upon barriers. o Include the barriers identified in the local boards' priority of service policies, including but not limited to not earning a "self–sufficient" wage and being part of population with a historically high unemployment rate, such as youth and returning citizens, towards meeting the priority of service goals. Also include all WIOA youth as meeting priority of service based on the legislative barriers required to enroll in the program. o Exclude the requirement to inform individuals and publicly post priority of service information, other than for veterans and their spouses. By informing individuals of their priority, we have concerns this will lead to complaints where an individual is not provided services due to other reasons. Also, publicly posting this information could imply to both businesses and jobseekers that WIOA is an entitlement program, which it is not. o It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for services / training for individuals with barriers. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. Regarding informing individuals of priority of service, the portion of the plan referenced merely suggests posters as one means to inform customers about priority of service. Local areas will have flexibility in how they outreach and provide information to priority populations. • Transitional Jobs (PA WIOA Plan p. 70): While transition jobs are appropriate and necessary for individuals with poor or non–existent work history, CPWDC respectfully requests this be restated as a goal rather than a requirement for transitional jobs. It is our belief that on–the–job training contracts, which result in unsubsidized employment should take preference over funding transitional jobs that are time–limited work experiences that do not result in continued, unsubsidized employment. Also, WIOA only prescribes a work experience expenditure requirement for youth. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. • Industry Partnerships (PA WIOA Plan 4.4 p. 16): CPWDC fully recognizes the value of Industry Partnerships and sharing information between businesses within the same industry. At its peak, CPWDC provided financial support to seven Industry Partnerships with Industry Partnership funding appropriated in the state budget. As state funding for Industry Partnerships has declined, CPWDC has not received Industry Partnership

funding during the past two years and received reduced funding in prior years. CPWDC makes the following recommendations in regards to Industry Partnerships due to the uncertainty of funding. o Allocate Industry Partnership funding from the state budget to all local workforce development boards (LWDB) instead of competitively awarding grants to only selected LWDBs. o Accept in–kind services, such as personnel cost to organize meetings and trainings, donated meeting space, etc., towards meeting this requirement. o Encourage and incentivize, rather than mandate, LWDBs to provide financial support to Industry Partnerships. Response: Industry Partnership funds will continue to be allocated through a competitive grant process. The commonwealth believes that Industry Partnerships must be a state/local partnership. In–kind services will be permitted to count, to some extent, toward the requirement for local support of Industry Partnerships. Industry Partnerships and similar sectoral partnerships are central to the Governor's vision of an industry–engaged workforce development system. For this reason, it is critical that LWDBs as well as the state and industry partners contribute to their support. • State Policies and Guidance (WIOA Plan p. 74): The following are comments specifically in regards to the Workforce System Policies attached to the WIOA plan (p. 74). Since the implementation of the Workforce Investment Act (WIA) in 1998, the Commonwealth has used a consortium model to act as the One–Stop Operator in accordance with WIA. WIA specifically excluded workforce boards from being one–stop (PA CareerLink®) operators. Section 107(g)(2) of WIOA states that a Local Board may be designated or certified as a one–stop operator only with the agreement of the Chief Elected Official in the local area and the Governor. CPWDC respectfully requests the restriction that a local workforce development board and its staff cannot be designated as a PA CareerLink® Operator be removed from the policy for the following reasons. Several of the functions of the local board, in partnership with the chief elected official, are to provide program oversight of the one–stop delivery system and ensure the appropriate use, management, and investment of funds. The proposed minimum role of a one–stop operator in WIOA is to perform coordination across one–stop partners and service providers. Pennsylvania's plan furthers establishes that the operator will consider how well all of the one–stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another and demonstrate the capacity to meet the needs of customers accessing the PA CareerLink® system (p. 58). Membership of the local board includes representatives of private business, economic development and mandated partners in the PA CareerLink® including Title II Adult Basic Education, Title IV Vocational Rehabilitation, Wagner–Peyser, Veterans, Trade Act, and Unemployment Compensation. Because of the previously mentioned functions and responsibilities of the board, the LWDB has an inherent interest in ensuring the PA CareerLink® partners work together and create a cohesive workforce system that excels. The diversity of the local board membership representing multiple PA CareerLink® partners also provides a check and balance so that no WIOA program would receive preferential treatment if the LWDB is the operator. Another firewall and checks and balance in WIOA is the requirement that both the Governor and the chief elected official must agree for a local workforce development board to be an operator. The Governor has the option to disallow the LWDB from being an operator where firewalls of the operator, board, and service provided could be blurred, which may exist in cases where career services and training services are provided by an inter–related agency (i.e. county agency or commission structure) that is also the employer of local workforce development board staff and/or fiscal agent staff. For LWDB that do not provide career and training services, there are no potential conflicts of interests that could arise from the LWDB being an operator; therefore the Governor could allow for LWDB that do not provide career services to be an operator on a case–by–case basis. Along with the interest of the LWDB for wanting the PA CareerLink® to excel in meeting performance, there are also financial reasons the LWDB should not be precluded from being the PA CareerLink® Operator. Under WIA, additional funding from local boards was not set aside for a PA CareerLink® Operator because the members of the One–Stop Operator Consortium provided oversight at no additional cost to the programs they represented on the One–Stop Operator Consortium. Also, workforce boards monitored the PA CareerLink®/ one–stop system as part of the PA CareerLink® certification process

for no additional costs to the workforce board. WIOA now requires local boards to procure a PA CareerLink® Operator. Unless a new organization or the existing Operator Consortium submits a zero–cost proposal to be the PA CareerLink® operator, local workforce development boards and other state partners will now have to pay for something that had no associated cost in the past. This additional cost could be mitigated if local boards and their staff can be the operator. Response: The governor is not prepared to allow local workforce development boards or staff to the local boards to serve as single–entity operator or as part of a consortium that will make up an operator. Pennsylvania had been well served by WIA's prohibition on local Boards serving as operators. The commonwealth is currently considering all aspects of the operator selection process and will issue guidance at a later date. Carol Barbarich of the Central Susquehanna LPN Career Center commented: I am a member of a consortium of six Practical Nursing Programs that participate in Perkins Funding. Our small programs benefit greatly from Perkins funds utilizing those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from the Perkins grant allow our programs to provide a quality education to those who will serve the health need of Pennsylvania's citizens. The WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Careel Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate any feedback regarding this proposal as it is available, as the potential impact to our nursing programs could be very detrimental. Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over $2,000 as a result of this alignment. With a decrease of $10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in–kind or funds. The Chief Elected Officials and local Workforce Development Board Chairs from Central, North Central and Southern Alleghenies Workforce Development Boards offered the following comments: • We write to you representing twenty–one rural counties covering over a third of Pennsylvania's land mass. While we applaud the collaborative approach that is occurring at the state level amongst partners we wish there was more time for dialogue with the local system. We represent the rural local system and are poised to continue to serve our customers, the residents and employers of Pennsylvania, as we have successfully done in the past by adapting our services as our local customers' needs change. We recognize that Pennsylvania is a very diverse state that includes urban population centers and very large rural areas. That is why it is difficult to take a 'one–size fits all' approach that doesn't take in to account local demographics, local challenges (both from a geographic and human resource perspective) and local economic conditions. Specifically in regard to the draft Pennsylvania Workforce Development Plan that we reviewed, we have one major concern and offer an alternative approach. Our biggest concern is in regard to the stated expenditure requirements for WIOA Title I: 30% in 2016, 40% in 2017, and 50% in 2018 with expectations to serve those with barriers at an increasing rate as well. While the state plan is being developed as a unified state plan and takes a much more comprehensive view of workforce development we struggle with why this mandate would fall on one partner. Instead please consider setting broader benchmarks that actually encourage

cross–program/cross–department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. For example, participants can be co–enrolled in Title I, Title II, Title IV, or EARN programs to name a few partners, all of which financially support adult, dislocated worker and youth participants in training and increasing employability skills; however the proposed minimum expenditure requirement for Title I puts the financial burden on Title I partners and doesn't account for the leveraged training resources of the Adult Education, Vocational Rehabilitation and EARN providers. In addition to a more inclusive goal we recommend that the focus be based on numbers of customers, both business and jobseeker, receiving value–added services resulting in increased skills attainment, job placement, and retention rather than expenditures. A goal to increase the number of credentials in Pennsylvania in the next three years by 30% is something everyone can get behind and support but urge local flexibility based on local needs. An expenditure requirement will result in unintended consequences, especially in rural areas. A minimum expenditure requirement from 30–50% of all WIOA Title I (Adult, Dislocated Worker, and Youth) funds will result in the closing of multiple PA CareerLink® offices increasing the distance and travel time for customers and a reduction in services available at the PA CareerLink®. In our 21 county region, access to public transportation is sparse and reducing the number of PA CareerLink® facilities will put an increased burden on individuals with barriers to employment who cannot afford the gas to travel 40 plus miles for services. While staffing is the largest portion of the Title I expenditures in our region, the majority of those expenses pay for Workforce Specialists and PA CareerLink® Workshop Instructors who serve as mentors and provide career services including development of learning skills, critical thinking skills, digital literacy skills, communication skills, interviewing skills, punctuality, personal maintenance, professional conduct, and self–management skills to prepare individuals for unsubsidized employment and training. A minimum expenditure requirement will force local areas to lay–off these staff, unless their services are counted as training in the state plan, which will result in less individuals having access to services and receiving these critical skills and the mentoring that occurs not only while jobseekers are enrolled in our programs, but also during the year of follow–up after individuals enter unsubsidized employment or training. The emphasis on a minimum training expenditure for Title I could ultimately result in a few people in expensive training or a lot of people in cheap training. We like much of what has been identified in the state plan including greater support for industry partnerships, career pathways, and micro–credentials. However, we struggle with how this all will be implemented in light of the proposed resource allocation requirements for Title I.

Response: The State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. The process of implementing the WIOA state plan will provide opportunity for dialogue between the state, the LWDBs and the various local actors who make up the workforce system at the local level. Regarding training targets, we appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Another concern we would like to address is the increased reference to and reliance on technology for delivering services. While we agree that this is increasingly the "way of the world" it is not the reality in rural areas like ours. While roughly 90% of Pennsylvanians have access to high speed, wired broadband internet, our regions fall far short of the level of connectivity needed to fully utilize technology in service delivery as indicated in the broadband coverage map. Furthermore, many of our customers, especially those with significant barriers to employment, lack even the most basic computer skills and are therefore unable to enroll on Job Gateway. Many come into our PA CareerLink centers to first participate in the Intro to Computer classes and then, because they have no other access to technology due to the cost, use our PA CareerLink® computers to access Job Gateway. We have all experimented with virtual services, but given the many issues surrounding the availability and use of technology, the results have been mixed. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek

to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Michael DiBerardinis, Managing Director for the City of Philadelphia commented: On behalf of the City of Philadelphia, I am writing to support the portion of the Commonwealth's proposed WIOA Combined State Plan that provides: LWDBs and PA CareerLink® centers will be required to use between 5 and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and to ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. The City of Philadelphia strongly supports designation of WIOA funds for transitional jobs as part of the state's workforce development strategy. While unemployment rates have abated throughout the Commonwealth and the City, too many Pennsylvanians face stubborn barriers to employment and continue to find obtaining unsubsidized jobs impossible. People with criminal records, youth, and the long–term unemployed are among those for whom jobs have proven elusive, even as economic conditions have improved. Over the last 20 years alone, Philadelphia has witnessed the power of transitional jobs in establishing pathways to employment, while at the same time providing desperately needed income. The Transitional Work Corporation helped thousands of parents through jobs at the onset of welfare reform. More recently, Way to Work Philadelphia provided more than 13,000 adults and young people with jobs in the depths of the Great Recession, operating based on stimulus funds from May through September 2010. Currently, pilot programs have placed returning citizens in transitional jobs in Philadelphia's Department of Parks and Recreation. These programs illustrated how a well–designed program can serve community priorities while also providing individuals wiht jobs. The City of Philadelphia struggles with the highest rate of deep poverty among the top ten cities in this country. The inability of so many of our residents to find work, because of employment barriers and insufficency of supply, is one of the major reasons for this entrenched poverty. Transitional jobs are a powerful tool that we hope to have among our anti–poverty strategies. We commend the Commonwealth for recognizing the importance of transitional jobs and stress the necessity for this provision to remain in the plan. We look forward to working with the Commonwealth to blend WIOA and other income streams into a vibrant transitional jobs program. Response: We appreciate the comment in support of requiring a portion of funds to be used for transitional jobs. Cheryl Krieg from the Clearfield County Career and Technology Center commented: I am a Practical Nursing Program Director who is part of a six school consortium that participates in Perkins Funding. Our programs utilize those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from the Perkins grant allow our programs to provide a quality education to those who will serve the health needs of Pennsylvania's citizens. It is my understanding that he WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Career Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate your taking this concern into consideration. Please share any information regarding this proposal as it is becomes available, as the potential impact to our nursing programs could be quite detrimental. Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over $2,000 as a result of this alignment. With a decrease of $10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will

continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in–kind or funds. The Coalition for Low Income Pennsylvanians offered the following comments: The Coalition for Low–Income Pennsylvanians strongly supports Pennsylvania's Proposed State Plan implementing the federal Workforce Innovation and Opportunity Act. The Coalition for Low Income Pennsylvanians (CLIP) is a group of 34 diverse organizations from across Pennsylvania including the faith community, service providers, legal service advocates, anti–poverty and anti–hunger groups, children's advocacy organizations and community action agencies. CLIP's primary mission is to protect individuals and families who struggle against the ravages of poverty by advocating for responsible, compassionate, and cost–effective government policies. As advocates for low–income persons, including especially those who receive public assistance, our interest in the WIOA State plan is focused primarily on: (i) priority of service for recipients of public assistance and other low–income persons; (ii) Career Pathways programs; and (iii) transitional jobs. More detailed comments supportive of the Proposed Plans provisions in these areas have been submitted by Community Legal Services and the Community Justice Project. CLIP endorses those comments. We support the Proposed WIOA State Plan because it offers real promise of education, training, and paid work experience for parents whose families receive public assistance and who wish to raise their families' standard of living through employment in jobs that are in demand and pay a family sustaining wage. Pennsylvania's proposed WIOA state plan would provide these families the avenues and opportunities they need to obtain these kinds of jobs. Priority of service for families receiving public assistance was a requirement in the Workforce Investment Act (WIA) and the Job Training Partnership Act (JTPA) before that. For the most part, however, states did not live up to their obligations under this provision. National data show that only 48.7 percent of adult "exiters" who received training and/or intensive services through the WIA Adult funding stream were "low–income individuals" in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients. To address past failures, WIOA strengthens WIA's priority of service requirements. It also adds a promising new adult education opportunity for low–income parents in need of GED, ESL, or literacy instruction through its emphasis on Career Pathways programs, which offer adult education infused with career counseling and assistance with transition to postsecondary jobs skills training. Moreover, WIOA permits up to 10% of training funds to be used for transitional jobs (subsidized employment) for low–income parents who lack work experience or face other barriers to employment. The following are the specific provisions in the Proposed Plan that we support: Priority of Service: We think the plan, as proposed, does a good job of addressing the training needs of low–income parents through strong and mandatory provisions implementing WIOA's priority of service provisions for recipients of public assistance and other low–income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10–12, 2.1 and 2.11) The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what "priority of service" means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67–70) Career Pathways: The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions. Transitional Jobs: The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this. Response: We appreciate the comments in support of the plan's overall focus, priority of service and career pathways provisions, and requirement to fund transitional jobs. Community College of Allegheny

County offered the following comments: • Perkins – It is recommended that the Commonwealth separate Perkins from the state's combined WIOA plan. The current structure is efficient and effective; including Perkins with the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time, decreasing the amount of funds available to the training providers. Diverting even a small percentage to bureaucratic overhead harms students and clients of the workforce system. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan. • Board Subcommittees – It is recommended that community colleges be included on Board Subcommittees, including the Youth Committee (pp. 13–14) as the colleges have extensive experience serving youth aged 18–24. Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. • CCAC has been designated a Military Friendly college and we would be pleased to serve as a model or best practice. Response: The commonwealth appreciates this comment and PDE looks forward to learning more about the best practices in place at CCAC. • It is recommended that the Commonwealth use the Governor's set aside for business education partnerships with community colleges. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds. Community College of Beaver County offered the following comments: • The Commonwealth should separate Perkins from the state's combined WIOA plan: o Community colleges have a strong working relationship with PDE relative to the use of Perkins funds. o Unclear what the benefit is of combining Perkins with the state WIOA plan. o Imposes an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers. o More demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to bureaucratic overhead harms students and clients of the workforce system. o Current structure is effective and efficient. o Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan. • Commonwealth should consider leveraging the experience and expertise of the community colleges in the workforce system, rather than concentrating funds in, and requiring decision–making to be run through the WIBs and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. Community College of Beaver County has ongoing partnerships with area energy, advanced manufacturing, health–care, and technology–based companies in the region. Response: The plan does seek to leverage the experience of expertise of community colleges as part of the workforce development system. WIOA Title I funds are required to be allocated to Local Workforce Development Boards who decide how funds are spent locally in alignment with federal and state laws, regulations and policies. • Community colleges

should be represented on Youth Committee when they share geography. Community college has extensive experience in serving youth aged 18–24 and building career pathways (First paragraph on pages 13 and 14). Response: We appreciate the comment and note that Local Workforce Development Board membership is determined by local elected officials. • Community colleges should be included on board subcommittees. (Page 57) Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. • The State should use the Governor's set–aside for business education partnerships with community colleges. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds. • Community College of Beaver County is designated as a veteran friendly campus while could serve as a model/best practice (page 51). Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice. Community College of Philadelphia submitted the following comments: • Page 8 – Goal 1: Establish Career Pathways: High Priority Occupation's (HPO's) and Entry–level occupations that lead to HPO's – Community College of Philadelphia (CCP) would like to see the State be flexible around what they accept as entry–level jobs that lead to HPOs. Individuals with barriers for employment are often only able to enter at the lowest level and thus, these pathways need to recognize work history in a related field is important to leading them further into HPOs, and other educational opportunities. Also, CCP would like to see mention by the State of understanding emerging job growth areas and supporting proactive programs that get the State ahead of the data, which often reflects historical growth, rather than where trends are emerging locally or regionally. Allow for some experimentation here with institutional partners that are trying to align their programs with future needs in specific markets. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. Local areas are able to petition for occupations to be added to the local HPO list based on documented employer demand in cases where data alone does not qualify the occupation for the HPO list. We also note that while the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. • Page 9 – Section 1.6 – Registered pre–apprenticeship and apprenticeship programs – Successful models have usually tapped into state community college and technical colleges to connect employers to the populations most in need. More detail should be provided about the State's plan here. Consider utilizing community colleges as a resource for this important resource. Response: We appreciate the comment and recognize that community colleges and technical schools often play an important role in Registered Apprenticeship programs. • Page 9 – Section 1.7 – Will the State be looking at how HPOs vary by region and how they can support these differences? Response: The commonwealth produces statewide and regional HPO lists in recognition of regional differences. The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Page 9 – Section 1.8 – Keep in mind FERPA requirements of students, and whether some EPTL's must protect this data. Consider ways that data can be collected without FERPA concerns. Response: Confidentiality of students is of utmost concern to the commonwealth. Any data collection or reporting that is conducted will be vetted and reviewed to ensure FERPA compliance. Under FERPA, there are exceptions to data collection when the data is to be used for program evaluation, which these data collections would fall under. Therefore the commonwealth believes that the programs will be able to function without violating the provisions of FERPA. • Page 10 – Section 1.10 – With some of these populations, work experience alone is important. Many employers may be creating lower wage jobs by up–skilling incumbent workers into other higher level positions. This

model is important to encourage among employers because up–skilling incumbent workers helps employer with retention and productivity, thereby freeing up entry–level positions for the populations the State is trying to prioritize. These positions may not be on a specific pathway, but as noted many will stand out for further training into pathway positions once they are employed. Response: We appreciate the comment and will consider it as we continue to define and establish career pathways. • Page 11 – Section 2.3 – We encourage the State to include emerging growth trends by region as part of their expansion of the IP's. Some boutique industries may be very successful in certain areas, but might not rise to a statewide level. Response: Thank you for the comment. The most recent IP grant availability allowed for proposals in all 12 industry clusters shown in the table on page 27 of the State Plan. • Page 11 – Section 2.4 – Better alignment and expansion of IP and WEDnetPA programs – We would ask that the structure remain streamlined and continue utilizing the community colleges (CCs) and state universities (SUs) as the fiscal agents and training partners. Any expansion of the WEDnetPA program that comes with coordinating with USDOL needs to understand current issues of the program expressed by the existing partners (CCs and SUs) to DCED: DCED needs to address the underfunding of the administrative burden of the program (8%), which only covers a portion of the cost to administer it for the partners; Re–establish some funding to assist the WEDnetPA partners with the administrative burden and expand the amount of training the partners are able to perform (currently 35%, increase to 50%) to help offset that cost. This helps streamline for employers if they so choose to use the partner as their trainer; increase flexibility of program to include broader definitions within the sectors. Currently, if a business does not have a qualifying NAICS, it requires an exception even if the specific training is directly related to the eligible sectors covered by WEDNET. Exceptions are capped at 10%. We are finding many companies have blended activities that are qualifying, but if they utilize a NAIC code from their original founding, they are pushed into the exception. We've had several professional firms who are now running technology arms of their business, and some processing and mechanical firms that are undertaking manufacturing that have been pushed into the exception and have not been able to access as much training funding as they could be eligible for if there were broader definitions. Response: Thank you for your comments, however the WIOA plan is not impacted by the issues noted. The College should contact the WEDnetPA program coordinator to discuss. • Page 11 – Section 2.6 – CCP is involved with Philadelphia Works on this effort and is looking forward to what will develop. We ask that the State remain flexible in its approach, as this is a learning process and we may find adjustments need to be made as we get employer feedback. Response: We appreciate the comment and look forward to continuing to work with CCP and Philadelphia Works on this project. • Page 11 – Section 2.8 – Community Colleges are frequently working with the State's priority populations on a daily basis and we see ourselves as an important front–line provider of training (credit and non–credit) that leads individuals towards careers and improved economic circumstances. We fully support the State's innovative approach to partnering directly with educational institution to support job seekers and employer needs. We would like the State to view the Community Colleges as an important preferred provider of training in key priority areas of economic growth, particularly in emerging fields in their local economies. This model is utilized by other states that have closely aligned their economic development and workforce structures. Response: The commonwealth also views the community colleges as a frontline training provider. The plan highlights a number of initiatives where the commonwealth has partnered with the community colleges to provide training and create career pathways. These opportunities will continue under the WIOA combined state plan. • Page 13 & Item 3.3 on Page 14 – We ask the State consider that community colleges be represented on Youth Committee when they share geography. CCP serves youths in both the 14–18 year old and 18–24 year old populations. Response: We appreciate the comment and note that Local Workforce Development Board membership is determined by local elected officials. • Page 15 – Goal 4 – The plan discusses low–quality jobs and high quality jobs, but the plan does not provide definitions of what qualifies for each. With respect to many of the populations the plan is prioritizing, often individuals may only qualify for these entry level positions that may be considered low–quality.

However, if they are connected to career pathway HPOs, these should be considered. Also, there are some employers who may offer reasonable wages, benefits, tuition reimbursement, but the jobs may be considered low–quality. What about such partners that may provide all the above, but are training OSY's in jobs initially deemed low–quality – laundries, caterers, retail, etc. – giving them essential work skills and an employment history? These can be important stepping stones for individuals to get on the right path towards more ambitious jobs. For certain populations, there may be a role if there is a clear connection to employability for the hardest to serve. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. • Page 40 – DOC Coordination – As an institution committed to helping Philadelphia address its returning citizens (re–entry) population, we encourage greater coordination and inclusion of innovative community college programs to help these individuals earn degrees, learn career skills, and gain employment. Response: We appreciate the comment and agree that coordination with community colleges is important. • Page 39–40 – Keystone Education Yields Success (KEYS) – Currently, CCPs service a minimal cohort of students below the age of 21, and have not coordinated with WIOA Youth Service Providers. If we can expand in this area programmatically, it could allow us to leverage WIOA funds for wage subsidy, which could positively impact our job placement, and potentially improve our performance goals in this area. Response: DHS supports the coordination of DHS programs with WIOA programs. DHS will continue to refer TANF and SNAP recipients enrolled in or interested in enrolling in the community college to the KEYS program. • Page 43 and 51 – Dept. of Military and Veterans Affairs – CCP is designated as a veteran friendly campus and has a dedicated Veterans Resource Centers and we would encourage more direct partnerships between DOL and Community Colleges on this priority population to be a best practice model for the State. Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice. • Page 49 – Engagement with Educational Institutions – We are encouraged and support the increased direct engagement with educational institutions and would like the State to see CCs as a frontline preferred training provider, particularly in developing internal programs that help industries build pipelines of entry–level and middle skill workers. We would like to see the State provide assistance in helping CCs institutionalize efforts that are funded by major grants so that the expertise remains in–house. Response: The commonwealth does view the community colleges as a frontline training provider. The plan highlights a number of initiatives where the commonwealth has partnered with the community colleges to provide training and create career pathways. These opportunities will continue under the WIOA combined state plan. • Page 52 – PA TIP – Can the State consider expanding the program to include non–credit certificate programs offered at community colleges? The program should also cover more health care occupations due to the vital importance of this industry to Philadelphia's economy. Response: We appreciate this comment and will reach out to the Pennsylvania Higher Education Assistance Agency (PHEAA), which administers the PA–TIP program, to discuss this request. • Page 52–53 – Coordinating with Economic Development Strategies – States with employer responsive and supportive programs generally have robust ties between economic development strategies and community colleges as training partners. We would welcome a greater coordination among DOL and DCED programs and supports to employers via direct customized job training through community colleges. This mentions that joining the PREP will include community colleges, Career Links and LWDBs. PREP currently provides funding to its PREP partners. Does the expanded version include funding for the added partners, and if so, what would that help support? As mentioned, CCs and SUs provide administrative support of WEDnetPA, well in excess of the 8% administrative fee we are allowed to charge. We would welcome support of the administrative time we spend on this and other economic development programs the State is seeking for us to promote to employers. Utilizing an additional CRM database on top of current one

will add additional cost and coordination. Will the State provide for free to partners? Response: The community college is considered a service provider within the workforce development environment. As an anticipated participating provider in the PREP network, the community college will improve collaboration within their respective service area using the available CRM. This is a key WIOA goal. The commonwealth will work with workforce and economic development partners to provide CRM tools that are cost effective and efficient. With respect to the PREP CRM, the commonwealth has, and plans to continue, to pay these costs. DCED does not anticipate a significant additional burden relative to the use of the available CRM. • Page 53 – Keystone Education Yields Success (KEYS)— Emphasis must also be placed on employment opportunities, VWE/Internships, and High Priority Occupations as a KEYS Program focus. These concentrations also place us in the position of partnership development, and relationship managers– evidenced by our employer and community service network. Response: Obtaining employment is the anticipated outcome for all individuals seeking postsecondary credentials. KEYS can be an important contributor to that outcome. If internships are part of the program, that would be a great benefit to the students. • Page 57 – Board Subcommittees – Recommend that community colleges be included on board subcommittees. Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. • Industry Partnerships – Community Colleges have our own business education partnerships. Community Colleges used to be administrators of some Industry Partnerships. There can be a lot of overlap for employers between the IPs and employer advisory boards for the community colleges. We would suggest that a portion of the Governor's set aside be used to support partnerships at the community college level. If the IP model remains the same, we would encourage the State to emphasize to the IP organizing entity that the area community colleges can tap into these groups more directly. This might decrease the amount of overlap among employers being tapped for these numerous committees. Response: We appreciate the comment and encourage Industry Partnerships to consider community colleges as partners to the degree they are not already involved. • Page 83 –89 – Youth Activities – There should be a concerted effort to fund programs for OSY and basic skill young adults (ABE, GED, and ESL) that will concurrently enroll and accelerate them to secondary and postsecondary credential attainment. These program models (such as Gateway to College) provide over–aged/under–credited or credentialed youth and young adults who need additional supports to reach educational goals and attain jobs at an accelerated pace, effectively "catching up" those individuals who have fallen behind. A focus on dually–enrolling these individuals into programs that address/support low literacy and numeracy skills and limited credits toward high school completion with the end goal of an industry–recognized postsecondary credential leading to employment can make a real impact in addressing the educational and employment barriers these individuals face. Response: The commonwealth will explore models and funding options for integrated education and training and other accelerated learning opportunities for the populations identified in the comment. • Page 221 – REO Program – The plan makes no mention of whether Community Colleges are eligible to apply for the REO program. They should be eligible as a major provider of assistance to get these individuals employed. Or community colleges should at least be considered for the innovative strategies. Response: The US Department of Labor offers REO funds directly to applicants. The commonwealth plays no role in determining what entities are eligible for REO funding. • Page 264 – Leverage local, federal and philanthropic funds for workforce development – Having the Governor convening with Philanthropy on workforce development is important, and very supported by community college, as this is a high priority only for a select number of private philanthropies. Response: We appreciate the comment in support of our plans to seek philanthropic funds to support our efforts. • We recommend that the Commonwealth separate Perkins from the State's combined WIOA plan. The benefit of combining Perkins with the Commonwealth's WIOA plan is unclear and the current structure is effective and efficient. This likely will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers. There is

already more demand for Perkins services than the existing appropriation can support. Diverting even a small percentage of funding to overhead harms students and clients of the workforce system. Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete. The College has a strong working relationship with PDE relative to the use of our Perkins funds. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan. • The College recommends that the Commonwealth consider leveraging the experience and expertise of the community colleges in the workforce system, and consider providing funds directly to community colleges. Community colleges have significant experience in serving the targeted populations and in working with community partners to provide wrap around services. The College also has good working relationships with employers in the local community. Concentrating funds in, and requiring all decision–making to be run through the Workforce Development Boards and CareerLinks, potentially leads to dilution of the funds into training and instead goes towards other administrative costs. Response: The plan does seek to leverage the experience and expertise of community colleges as part of the workforce development system. WIOA Title I funds are required to be allocated to Local Workforce Development Boards who decide how funds are spent locally in alignment with federal and state laws, regulations and policies. Community Legal Services and the Community Justice Project offered the following comments: Community Legal Services and the Community Justice Project submit these comments on behalf of our clients in strong support of the Wolf Administration's proposed Workforce Innovation and Opportunity Act (WIOA) state plan, which was published for public comment on December 28, 2015. Our comments here focus on the importance of using the full amount of funding designated for Transitional Jobs (subsidized employment). Need for Transitional Employment WIOA allows states to spend up to 10% of Title I funds on transitional employment opportunities for participants. The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs, especially to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this. Access to transitional employment for low–income Pennsylvanians is essential to address persistent unemployment and high poverty rates across the Commonwealth. While the overall Pennsylvania unemployment rate has fallen considerably since the recession, persistent unemployment remains a serious problem for many people. 26% of Philadelphians live in poverty – the highest rate of any large city in the nation – while 33 counties in Pennsylvania have poverty rates of 13% or higher. Transitional jobs set people up for long–term employment by helping them "get a foot in the door" of workplaces, revitalizing Pennsylvania's economy while helping people move out of poverty. Transitional jobs are especially critical for low–income individuals who lack work experience and/or face significant barriers to becoming employed. When compared to individuals receiving only pre–employment services, individuals placed in transitional jobs have better long–term outcomes including significant increases in earnings. Additionally, investing in transitional jobs leads to cost–savings for the state. One study of transitional jobs in New York found cost savings of $106 million over three years after subtracting the state's initial $47 million investment. Prioritizing investment in transitional jobs is thus a cost–effective means of connecting people facing persistent employment barriers to the workforce. Pennsylvania has had several successful transitional jobs programs in the past. Most recently, the Way to Work program connected more than 25,000 Pennsylvanians to employment during the recession. Over 4,600 employers, including a third from the private sector, participated and were

able to hire quality workers at a reduced cost. Sandi Vito, the Secretary of the Pennsylvania Department of Labor & Industry at the time, stated: “I cannot stress enough the positive effect this program has had on the lives of unemployed Pennsylvanians.” It is time for Pennsylvania to again prioritize transitional jobs. Through dedicated WIOA funding, combined with funding from other sources, Pennsylvania can build a transitional jobs program that will tackle the persistent unemployment faced by particularly vulnerable Pennsylvanians, helping them become stable while building pathways to long–term employment. Target Populations for Transitional Employment WIOA places special importance on serving high needs groups. According to WIOA, priority for individualized career services and training services must be given to recipients of public assistance, other low–income individuals, and individuals who are basic skills deficient. Certain groups within these priority categories face particular barriers to employment that make a transitional jobs program especially critical. Virtually all persons in the following target groups fall within the WIOA definition of "other low–income individual" and are therefore entitled to priority of service. People with criminal records: Even for individuals with old and minor records, finding employment can be a challenge. People with recent criminal records and those on active probation and parole face even greater barriers to finding work. In Pennsylvania, over 250,000 people per year are on active supervision. A year after returning home from prison, 60% of people remain unemployed. Getting connected to employment quickly upon returning to the community is one of the best ways to prevent recidivism. For example, one study showed that participants in a transitional jobs program were significantly less likely than the control group to have been arrested, convicted for a new crime, or incarcerated three years after entering the program. Once people with criminal records are able to connect to the workforce, employers are more likely to feel comfortable continuing to employ them. Future employers will also be more likely to employ people with criminal records who have strong relevant work experience and positive references. Youth: The youth unemployment rate is at least three times higher than the adult rate, and nearly 30% of Philadelphians aged 16 to 24 are unemployed. Even for youth who do not have juvenile or criminal records, finding employment is tough, especially without prior work experience or references. For young parents, the challenges to connecting to the workforce are even greater. By accessing transitional jobs, young people are able to build critical work experience, skills, and connections, which greatly increase their ability to move on to long–term employment and ultimately move themselves and their families out of poverty. Recipients of income supports: The end of the General Assistance cash assistance program in 2012 shredded Pennsylvania’s safety net for people facing barriers to employment. Particularly impacted by these changes are people with disabilities who face difficulty finding employment, yet do not qualify for SSI or other benefits programs. Additionally, because of federal SNAP (food stamp) rules, more than 30,000 childless adults without disabilities are at risk of losing SNAP benefits in 43 Pennsylvania counties beginning in June 2016 unless they can find qualifying work. Connecting these vulnerable groups to transitional jobs will allow them to develop an income stream, retain vital benefits, and stabilize their lives. By becoming more financially stable in the short–term, these individuals will be more prepared to transition to permanent employment in the long–term. Conclusion We thank the Administration for including in the state plan that 5%–10% of funds will be used for transitional employment. We believe that utilizing the full amount of funding possible to create transitional jobs is essential, both to provide badly needed income to people living in poverty and to provide pathways to long–term employment, especially for those who have faced significant barriers to becoming employed. Response: We appreciate the comments in support of transitional employment opportunities and the requirement that local areas fund them. We agree that individuals with criminal records, youth and recipients of income supports are often well–suited for transitional employment opportunities. Rich Krankota, Director of Veteran Services for Crawford County offered the following comments: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to up–skilling the commonwealth’s workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the

bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be

successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or law wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. Brenda Wait from the Crawford County Assistance Office submitted the following comments: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to up–skilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on

the local area’s ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or law wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change

in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. The Cumberland County Library System offered the following comments: • I have reviewed the Strategic Planning Elements of Pennsylvania's WIOA Combined State Plan. I am writing to you as a public librarian. I've worked in libraries on either ends of the financial spectrum: for 12 years at an economically distressed library in Pottsville, PA and for 23 years at one of the state's most successful library systems in Cumberland County, PA. My current position has allowed me to become knowledgeable about the needs of our local Cumberland County work force and employers, plus the services offered by local educators and work force development agencies. Specifically:

Goal 1: Establish career Pathways: On page 9, point 1.3, the draft plan mentions combining education, training, counseling and support services from a variety of sources. Many of the commonwealth's public libraries offer online educational databases that provide training in specific skill areas (e.g. Lynda.com) or offer practice tests and tutorials that help learners complete employment/skill tests (e.g. Learning Express or Cengage's Testing and Learning Resource Center database). These resources should be included in lists of resources available to learners (page 9, point 1.8), and also be correlated to badge, micro–credentialing or entry–level programs (mentioned on page 10, point 1.9). Response: We appreciate the comments about the resources offered to jobseekers through the library. • On page 10, point 1.11, the draft plan mentions enhancing career guidance and navigation services. Libraries offer career guidance resource materials (such as books and ebooks) and career guidance databases that provide information and support. These resources could be expanded and promoted by the commonwealth, and reach many the plan's targeted constituencies. In addition, the commonwealth could provide libraries with password protected access and training for any statewide proprietary databases that would help support workforce development goals. Response: We appreciate the comments about the career guidance resources offered to jobseekers through the library and we will seek ways to better utilize libraries within the workforce development system. • Goals 2: Invest in Talent in Strategic Partnership with Employers and Educational Institutions (page 10) I would comment here that libraries should be included in these "Strategic Partnerships". Over the last year, the Cumberland County Library System has collaborated with county officials, workforce development agencies and employers to discuss the needs of our area. These discussions have introduced our partners to the strategic role that libraries play in supporting and assisting those who are seeking new or better employment, and reinforced the perception that libraries offer a unique broad–based network in the county that provides residents with one–on–one help to address information needs, supporting resources (e.g. books, ebooks and online databases), free public Internet computers, and training offered from our local public meeting rooms. This enhances everyone's ability to reach local communities, and doesn't require people to travel to the county seat. Response: We appreciate the comments about the strategic relationships involving the library and workforce partners locally. • On page 11, point 2.5 the draft plan mentions expanding access to online education and training programs. All of Pennsylvania's public libraries have publicly accessible (free) Internet computers and nearly all have Wi–Fi hotspots that can be used to access supported training. Many also have public meeting

spaces that could accommodate local training sessions (in–person and online). I would like to recommend that you consider working with Commonwealth Libraries to leverage the power of libraries, both in purchasing online educational/training databases or resource materials (print or digital) and in providing training for librarians in how to better support residents' employment questions. Response: We appreciate the comments about libraries that offer online training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers and we will seek ways to better utilize libraries within the workforce development system. We did make further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. • On page 12, point 2.11 the draft mentions developing integrated education and training models for people lacking a high school diploma or need more skills. Often transportation is a barrier for many people needing training, again libraries could play a role in being a more accessible training site. Response: We appreciate the comments about the library's potential as a more convenient training location. • Goal 3: Increase Work–Based Learning Opportunities for Youth – Again libraries could serve as a site for youth workforce development trainings. Libraries also share an interest with the commonwealth in introducing high–risk out–of–school youth, especially very young parents, to the support that is available from the public library to not only help themselves, but also their children with early literacy training. Response: We appreciate the comments about the library's potential as a convenient training location for out–of–school youth. • On page 15, point 3.12 the draft discusses the Office of Vocational Rehabilitation efforts to reach more people with its services. Again, libraries could provide an ideal location for promoting these services, either through promotional literature, or on–site workshops. Response: We agree that libraries are a valuable, yet sometimes underutilized local community resource, and we will promote their use by job seekers, including individuals with disabilities, as an access point to workforce development resources. • Additional General Comments: During my library system's collaborations this past year with employers, workforce development agencies, educators and county officials, I have learned that: o Our county's parents generally seem to have a "got to go to college" attitude. This has not served our employers who offer family–sustainable wages in the 'trades' well, because vocational or technical educational paths are stigmatized/marginalized. As a result, Cumberland County does not have a sufficient number of people with these kinds of skills coming into the workforce. We seem to have too many college graduates. Our employers and educators alike believe that we need to promote the value of vocational–technical education with parents who have children as young as in fifth grade, before college path decisions are made. They comment that by the time kids are in high school, the decision has already been made. Libraries have been discussed as potential sites for programs with parents about the value of vocational education. In short, vocational/career/technical education needs an image makeover. o Mechanical, manufacturing and problem–solving skills are in short supply o Soft skills among younger employees (under age 30) are in short supply. (work ethic, team work and basic life skills) o In addition, access to quality child care is also a problem for employees, especially those new to working. Response: We appreciate your comments about your county's perspective on career preparation and a broader role for vocational and technical education, and libraries supporting these students. Regarding child care, DHS continues to enhance the child care options available to working parents. The STARS program is a program that encourages and rewards child care centers that hire excellent staff and participate in ongoing training. • Summary: I believe that Pennsylvania's public libraries (more than 660) have a broad state wide network that touches many local municipalities, both at the county level and at local borough and township levels. This network is uniquely positioned to help support the needs of those who are seeking new or better employment in our state. With the right level of support, libraries could help the state meet its workforce development goals and extend the reach of CareerLink offices and county workforce development agencies/schools. Libraries offer publicly accessible (free) Internet computers and Wi–Fi hotspots that could be used to access supported training. Many also have public meeting spaces that could accommodate local training sessions (in–person and online). Libraries across the state offer supporting resource materials (such as books and ebooks) and online databases that provide

training in specific skill areas (e.g. Lynda.com) or practice tests and tutorials to help learners complete employment/skill tests (e.g. Learning Express or Cengage's Testing and Learning Resource Center database). Finally, and most importantly, libraries offer librarians. These are people who are trained to offer residents one–on–one help with finding the best resources to meet their needs, be it a printed book, an ebook, a training program, or an online database resource. Therefore, I would like to recommend that your agency consider working with Commonwealth Libraries to leverage the power of our state's public libraries, both in acquiring online educational/training databases or resource materials (print or digital) that would be accessible to residents in 660+ strategically located facilities across the state and in providing training to librarians in workforce development needs/issues. Response: We appreciate the comments about how libraries assist jobseekers with basic computer skills, access to the Internet, and access to educational resources and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. Delaware County Community College offered the following comments: • Pg. 8 – Section 1.2 (also mentioned on pg. 49): Local Workforce Development Boards (LWDBs) will develop career pathway programs meeting the requirements of WIOA. Career pathway programs will include adult basic education (literacy and numeracy, English–as–Second Language, and high school equivalency instruction) and will permit participants to enter at any of these levels in addition to entering at the postsecondary level. COMMENT: We do not believe that LWIDBs should be responsible for or have the authority to develop education and training pathways. This activity should be driven by collaboration between secondary and post–secondary education partners, who routinely include employers on program advisory boards and are attuned to current and emerging high–demand occupations as well as specific employer needs for skilled workers. In turn, the education and training pathways would be presented to the LWIDB in their region. While the workforce investment system should certainly have input, they are NOT the experts in training, delivery, and education and should not have the authority to impose those requirements on the education and training providers. Response: We appreciate the comment and will revise the plan to state that LWDBs will lead the development of career pathways, in coordination with employers, multi–employer workforce partnerships and secondary and postsecondary education providers. • Pg. 9 – Section 1.7: The commonwealth will continue to refine the High Priority Occupation (HPO) process and list to ensure career pathways are aligned to occupations that are in–demand, have higher skill needs and are likely to pay family–sustaining wages. The commonwealth will consult with LWDBs and engaged employers to accomplish this goal. The commonwealth will also support placement of individuals with barriers to employment into quality entry–level jobs that provide the work experience and non–technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry–level jobs can serve as "on ramps." COMMENT: The process of challenging the HPO for a local area or region is difficult. In order for the partners to be more responsive to the needs of their region, it is important that the process not be too cumbersome that providers choose not to pursue the appeal, thereby leaving employers without a workforce pipeline that relies on an aligned training program. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Pg. 14, Section 3.3: The commonwealth has established a Youth Committee as a standing committee of the State Workforce Development Board, comprised of individuals with expertise in youth workforce and education issues, which will advise on statewide youth policy and programs and provide technical assistance to LWDBs and their youth standing committee. COMMENT: Community colleges should be represented on both the Youth Committee at both State and at local levels, since they have extensive experience in serving out–of–school youth ages 18–24. Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce

development board membership is determined by local elected officials. • Pg. 52 – Improving Access to Post–secondary Credentials: All training providers seeking inclusion on the ETPL will be required to describe the credential(s) to be earned. All Perkins postsecondary recipients report on credential, certificate or degree earned as part of their required accountability measures. COMMENT: There needs to be an accreditation/validation process established to become an eligible training provider. Public funds will not be spent wisely if students are able to choose training based on a sales call or pitch. There needs to be set standards that demonstrate the provider's ability to educate and train. Suggestions for assessment include: (1) periodic curriculum review by an advisory board of local employers; (2) competency assessment; (3) a determination of the qualifications of the training staff that include years of training and education levels and industry–recognized certifications and credentials; and (4) a determination of whether the cost for training is reasonable and in line with tuition and fees of other training providers, particularly public LEAs and IHEs? It is critically important that CareerLink personnel understand that programs delivered at community colleges provide the most comprehensive and affordable route for individuals seeking training or re–training. Using community colleges as the primary source of training represents is a direct taxpayer benefit by using public funds to provide educational opportunities that are cost effective and comprehensive in the services that are provided. Response: The State Plan's draft regarding "improving access to post–secondary credentials" is consistent with WIOA and the instruction the Governor has developed for training provider and program eligibility (Workforce System Policy (04–2015) Eligible Training Providers – Initial Implementation of the Workforce Innovation and Opportunity Act). This policy provides the criteria and procedures required for determining training provider and program eligibility for receiving Title I–B funds in Pennsylvania (which includes, among many criteria factors, standards of performance and demonstrated effectiveness). Additionally, much of the information used in determining training provider and program eligibility is then organized and made available to the public (through the ETPL and the LTPL described in the eligible training provider policy) for informing consumer–choice in the selection of training providers and programs. • Pg. 58 – How other one–stop partner programs will be assessed each year: The PA CareerLink® operator plays an instrumental role in assessing all one–stop partner programs. Beyond traditional program–specific performance metrics, the operator will consider how well all of the one–stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another and demonstrate the capacity to meet the needs of customers accessing the PA CareerLink® system. Program–specific performance is addressed in the response to the effectiveness of programs in the preceding two–year period question that follows. COMMENT: What background/ experience does the Pa CareerLink operator have with program development and assessment? Response: It is the responsibility of the Local Workforce Development Board to procure the one–stop operator, ensuring through the Request for Proposal review process that the candidates for Operator have appropriate background and experience with program development and assessment. • Pg. 65 – The commonwealth currently has a data system, WDQI, which incorporates all Department of Labor workforce program data, Unemployment Compensation (UC) wage record data, and TANF and SNAP participant data from Pennsylvania's Department of Human Services. The proposed plan is to incorporate Adult and Basic Literacy Education and Office of Vocational Rehabilitation data as well. In addition, the Department of Education (PDE) is working to integrate its current pre–k though grade 12 statewide longitudinal student level data into WDQI and develop more robust postsecondary data. This will enable the production of performance metrics via one data platform with reporting and analysis capabilities. COMMENT: There needs to be shared responsibility for performance reporting. Successfully completing, obtaining, and retaining employment is an effort shared by both the CareerLink staff and the training provider. Currently, however, it is only the training provider who is responsible for gathering employment data and is penalized if performance data including wage records is not provided. A true partnership would share this responsibility. Providers should be able to submit participant identification to the CareerLink and through the WDQI wage records accessed for verification. Personal information

disclosures are a part of the application process. Response: While we appreciate your comments, the purpose of WDQI is to measure program outcomes rather than act as an employment verification system. • Performance Exemption for Credit Courses/Programs: A change requiring accredited colleges and universities to submit performance data for college CREDIT programs would present an extreme hardship on the institution and negatively affect the number of HPO programs that would be available to Adult and Dislocated Workers. While there is an expectation by the LWDBs that CareerLink–funded students will complete their program requirements in a specified period of time, most students enrolled in community college credit programs do not progress at the same speed as noncredit programs. Some students take courses full–time; however, many students are part–time depending on their ability to pay tuition, work around personal obligations like children and jobs, or have to postpone schooling for any number of reasons. There is no “typical” community college student. To evaluate performance of a community college based on all students in that program and their ability to complete, in a non–associated agency’s imposed mandated time frame, is not realistic. Additionally, the proposed performance measures do not account for the many intangible benefits of college credit programs outside of the actual certificate itself, including the ability of the student to then transfer credit towards a higher degree and being able to enroll in courses such as credit internships and co–ops that generally lead directly to employment. As a result of these variables, it is more likely that one of two things will occur. Community colleges may decide not to submit CREDIT certificate programs because of the excessive burden of the performance measures. Or, because of the unattainable metric, credit programs will fall short of the performance measures and they will come off of the list of approved options. Either instance would potentially force students to go to private or for–profit schools that often charge more than the allotted ITA cap provides, thereby forcing students to take out student loans. Response: Collection of performance data for all eligible training providers is a federal requirement for which the commonwealth is unable to provide a waiver. The commonwealth is committed to identifying ways we can meet the federal requirement and ensure workforce program participants have access to a robust list of training opportunities. • KEYS Program: The KEYS program has been a successful program at community colleges for the past 10 years. There is no need to provide an additional layer of bureaucracy by channeling oversight of the programs through the LWDBs. That only reduces funding that would otherwise be available for direct services to program clients. KEYS needs to be open to more programs at the community college and not limited to AAS degrees (since most community college students require more than two years to complete associate degree requirements due to need for remediation and other factors). Include the same programs on the ETPL. Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program. The LWDBs will not have any oversight of KEYS programs. • Perkins Funding Community colleges have served as the primary post–secondary provider of career and technical education in Pennsylvania and throughout the nation for many years. Funding from the Carl D. Perkins Career and Technical Education Act has been instrumental in assisting community colleges with the necessary resources to develop curriculum, acquire equipment to replicate industry applications, serve members of special populations to ensure that they succeed in career programs, and provide professional development opportunities to enable faculty to maintain current in changes in the workplace. Career and technical programs rely on industry–led advisory committees to assist in identifying emerging high priority occupations, maintain programs that meet employer needs, and leverage other resources to offset the high costs that often accompany programs in advanced technology. In order to ensure that the Perkins grant funding continue to support education and training in an effective and timely manner, we make the following recommendations that relate to the State WIOA Plan: o There is no benefit to combining Perkins with the State’s Proposed WIOA plan. It would impose an additional and unnecessary bureaucratic burden on the colleges, in terms of increased reporting requirement. These additional requirements would reduce direct funding that would otherwise support students. o Community colleges possess the knowledge and expertise to develop curriculum and course sequencing to best meet the needs of skill attainment and effective

academic pathways to higher learning. o By working closely with employers and other stakeholders, community colleges are well positioned to meet the goals of the Workforce Innovation and Opportunity Act. o Community colleges should be considered as the first choice as an education and training provider for individuals seeking services through the CareerLinks. Private and for–profit training organizations charge significantly higher tuition and fees, placing a disproportionate burden on both the individuals seeking training as well as the LWDBs, whose limited funding is further reduced by allocating funds to high cost providers. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan. Kate Pursel, Dillsburg Area Public Library offered the following comment: I would like to take this opportunity to give my opinion on how the resources and expertise provided in public libraries could help to shape a stronger, more productive workforce which benefits all of us through a stronger Pennsylvania economy. I am currently a Library Director with many years of various jobs in various libraries including school, academic and public. I have personally used volunteering in a library as a springboard for my own career. Volunteering in libraries is a valuable community resource for students, seniors, parents re–entering the workforce, or the unemployed. I have seen many students working as a public library Page for their first job, gain valuable experience in responsibility, accountability and communicating with patrons and staff. Public libraries are the primary source for many unemployed workers for computer use and assistance with applying for jobs online, creating resumes, and finding job postings. This help is always available, all hours that the library is open. Public libraries are also becoming a source for older students earning a degree online, who need help navigating online databases and beginning their research. With initial help they become proficient themselves, but continue to use the computers available at the library to earn their degree. Entrepreneurs starting their business also rely on public libraries for computer use or WiFi, printing, copying and meeting room use. Many local businesses give presentations at public libraries to increase their awareness to the community. For all of the above reasons, public libraries should have increased funding to ensure these valuable career resources continue to be available. Increased funding is needed to ensure that skilled, educated Librarians are being utilized, valued, and paid, plus staff that is paid competitively. Libraries should be funded and acknowledged for the increased value they can bring to the community, not asked to submit applications for special additional career programs, when just by being open these services can be available. Response: We appreciate your comments on the library's support for the unemployed and for younger workers new to the process and your comments on the library's support for local businesses through technology and professional librarians. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48. Mariann Kmetz, Dimmick Memorial Library commented: I am the Director of the Dimmick Memorial Library in Jim Thorpe. I am attending meetings in Lehighton with the Carbon Chamber and Economic Development Council, CCEDC. The committee I am listening in on is The Carbon County Business/Education Partnership. I am there to speak on behalf of the public library and to encourage the school administrators (High School, Technical School, and the Community College) to use the library as a resource for their students. I am also hoping to find a way to provide career pathways for patrons who are no longer students and lack the necessary skills to secure employment. The plan you shared sounds wonderful on paper. I would love to be able to offer our patrons seminars for job training, access to computers dedicated to job training, and programs to teach our patrons basic skills. I cannot fund my ideas. Dimmick Memorial Library is small. We are poorly funded. I do not have the resources to offer programs on my own. I would love

the opportunity to become involved in the Workforce Development Plan. Response: We appreciate your comments on how the library in a small community could better serve jobseekers and employers and note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48. Disability Rights Network of Pennsylvania offered the following comments: • Page 7: This section contains multiple references to the goal of “creating more jobs that pay”. Specifically with regard to Section IV of the plan and Vocational Rehabilitation Programs (OVR), DRN wishes to emphasize that OVR is much more than simply another “jobs program”. OVR is unique from other job training programs because it emphasizes counseling and guidance and individualized services needed by Pennsylvanian’s with disabilities who wish to pursue meaningful careers and live independently. Its focus is individualized services needed to prepare for, maintain, obtain or advance in employment that are consistent with the unique interests, capabilities, abilities, and informed choice of the individual. Response: We appreciate the comment and agree that OVR offers a wide range of services to individuals with disabilities beyond simply job placement. • Page 12: This section highlights the policy that the Commonwealth be an “Employment First” state. DRN agrees that Pennsylvania should be an Employment First state. However, the Commonwealth needs an Executive Order or some type of legislation to make this policy official. Currently there is no such policy, and in order for this policy to truly impact employment services for people with disabilities and others, it needs to be formalized. Response: We appreciate the comment and agree that the Commonwealth should be an "Employment First" state. An Executive Order was issued by the Governor on March 10, 2016. • Under “Identified Areas for Improvement” there is discussion of improving the CWDS system that collects participant data and performance outcomes. DRN suggests that the CWDS system share data with the HCSIS (Home and Community Services Information System) utilized by the Department of Human Services. HCSIS should also share data with CWDS. This will ensure that people with disabilities can access employment services more quickly from Workforce Development partners. It will also allow for supports coordinators to have a better tracking mechanism for employment services. Finally, it will increase the amount of collaboration between the Department of Human Services, OVR, and other workforce development partners. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. • The last mentioned point is training of staff to ensure cross–program alignment. Training for staff must include training on obligations to provide reasonable accommodations to individuals with disabilities and how to ensure programmatic access for people with disabilities. Many people with disabilities feel that they are not adequately supported at Careerlink offices. Continually focusing on training topics around disability issues and the right to a reasonable accommodation, and sensitivity training will ensure that individuals with disabilities have full and equal access to Careerlinks. Response: OVR offer business solutions consultation and training that promote best practices for Employee Workplace Accommodations, Accessibility Assessment and Disability Etiquette presentations as additional no–cost services to workforce partners, businesses and organizations across Pennsylvania. • DRN supports the Memorandum of Understanding between ODP and OVR to increase employment supports and services for people with intellectual disabilities. Traditionally, people with significant intellectual disabilities have been underemployed or have worked in sheltered workshops. Allocating funding for OVR to work with individuals with intellectual disabilities will increase competitive community integrated work opportunities for young adults and adults. Response: We appreciate the comment in support of the MOU. • Section IV, Vocational Rehabilitation Programs, Input of State Rehabilitation Council, p. 110 – DRN supports increased OVR involvement in publicizing and making OVR customers aware of the opportunity to participate in Citizen Advisory Committees (CACs). The CACs are critical for OVR to find out about service delivery issues or other concerns from OVR customers and advocates. It is extremely difficult to find a centralized listing of CAC meetings. DRN recommends that, at a minimum, OVR publicize CAC

meetings on their website and send out notices on their listserv, and social media tools. OVR should also provide written information on upcoming CAC meetings to Centers for Independent Living across the state so that this information is readily available to CIL consumers. Response: We appreciate the comment in support of this effort. OVR will continue to promote CAC meetings and the sharing of District Office CAC best practices that are effective and well attended by consumer customers. • Section IV, Vocational Rehabilitation Programs, Input of State Rehabilitation Council, p. 111 – DRN also supports the Rehabilitation Council recommendation ensuring that all communication is accessible. We note one concern in the OVR response to the recommendation. The response outlines various accessible formats that will be provided. The language should also include, “or other accessible formats as needed to ensure effective communication as required under the Americans with Disabilities Act.” Response: We appreciate the comment in support of this effort. OVR promotes the message of "Access Equals Success" in support of the PaRC’s recommendation ensuring all communication is provided in accessible formats as needed and have added the suggested language to the state plan on page 110. • Request for Waiver of Statewideness, p. 113 – DRN recommends that during the period of this plan, OVR develop additional interagency agreements across the state to mirror that already in place with Berks County. This would eliminate the need for waiver of the statewideness requirement. Response: We are in agreement with the recommendation and appreciate the comment in support of expanding these efforts. • Section IV, Vocational Rehabilitation Programs, Coordination with Education Officials, p. 117 – This section summarizes the OVR Transition Policy outlining when counselors can work with transition aged youth. The policy should provide a timeline for development of the Individualized Plan for Employment (IPE) so that it is developed prior to high school graduation for students. This will ensure that graduating students have necessary employment and/or training services and supports in place prior to graduation. DRN recommends that IPEs should be developed and signed by OVR and the customer at least 3 months prior to graduation. In addition, if OVR finds any youth to have such significant disabilities that OVR cannot immediately find the youth eligible and provide cost services, OVR must develop an IPE to provide community based work experiences, other necessary evaluations to determine ability to benefit from OVR services, and counseling and guidance. In the event that a youth is found ineligible based upon severity of disability, OVR is reminded of its obligation provide that youth with information on his/her right to appeal the ineligibility determination, as well as his or her right to contact the Client Assistance Program or other representative of his or her choosing for assistance. Under WIOA, OVR is reminded that it must re–evaluate that youth on at least a yearly basis. DRN recommends that information concerning its written policy and procedure for the re–evaluations be followed on a statewide basis, tracked, and made available on OVR’s website and/or to the Pennsylvania Rehabilitation Council, DRN and the Client Assistance Program (CAP), on at least a quarterly basis. DRN recommends that youth who do not choose to apply for OVR services the first time they are approached be re–approached on at least a yearly basis. This information should also be tracked and shared as outlined in the previous comment. Response: We appreciate the comments in support of the plan. OVR is aware of its legal obligations to provide pre–employment transition services to students with disabilities. Once final WIOA regulations have been issued, OVR will amend its Transition Policy to address timelines for working with students with disabilities while in school and the development of their IPE. OVR has expanded its service definitions to include “Pre–Employment Transition Services” that will help direct individuals with disabilities who are still in high school into more competitive, integrated forms of employment. We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. As required, OVR will track and report information pertaining to Section 511 implementation as outlined in the final regulations. • Coordination with Education Officials, p.118 – There is a list of things that OVR staff must do as it relates to getting information to school age youth. This list should include the family training on options following high school, including employment alternatives to sheltered workshops. Response: We appreciate the comment and

recommendations for OVR's continued commitment and focus on transition serving students and youth with disabilities. OVR developed the Early Reach Program that puts Early Reach Coordinators out in schools and at community events talking about OVR services and how we can assist with transition. • Cooperative Agreements with Private Nonprofit Organizations, p. 119 – DRN recommends that all cooperative agreements with private, nonprofit organizations be available to the public. These, along with all active OVR policy memos should be posted to the OVR website and updated regularly. Response: We appreciate the comment and support effective communication and transparency. • Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, p. 119–120 – This states that OVR will coordinate with DHS program offices regarding supported and extended employment services. The proposed Consolidated and P/FDS waiver amendment states that waiver participants must be referred to OVR prior to receiving these services unless 1. Person is already competitively employed and needs extended supports; 2. The person is using supported employment vocational skill development purposes; 3. The person has an ineligibility determination from OVR; or 4. OVR has previously closed the waiver participant's case. DRN recommends that OVR develop and implement time frames for referrals of not more than 30 days to ensure that potential OVR customers are not waiting for extended periods of time between referral to OVR and eligibility determination. Response: We appreciate the comment that promotes continued collaboration and partnership between OVR and DHS Office of Developmental Programs (ODP). OVR continues to work collaboratively with ODP to identify and reduce barriers to employment for people with intellectual disabilities. OVR is implementing an Interagency Agreement with ODP that will provide for a jointly funded initiative to create additional VRC positions and additional funds for services for individuals with intellectual disabilities. Provider Transformation training will be taking place in spring 2016, facilitated by the Governor's Cabinet and Advisory Committee for People with Disabilities, and through the efforts of subject matter experts to help providers understand the implications of Section 511 of WIOA and the CMS final rule. • New Vocational Rehabilitation Counselors, p. 126 – DRN recommends that OVR analyze the number of counselors necessary to provide meaningful vocational rehabilitation services on a statewide basis, particularly in light of the new WIOA requirements. Response: We appreciate the comment in support of ensuring adequate number of OVR counselors to provide VR services. • Personnel to address communication needs, p. 128 – DRN recommends that OVR review the manner in which it assigns OVR counselors to improve effective communication between the counselor and the OVR customer. For example, a RCD may not be the best assignment for an individual who is hard of hearing, but not deaf. Further, all OVR customers should be advised of the right to request a counselor change. Response: We appreciate the comment. OVR promotes effective communication between counselor and the OVR customer throughout the VR process. Case transfer to a different counselor can be accommodated as situations warrant. • Special Populations, p. 129 – DRN recommends that the "Transition Resource Manual" identified here be made available to other organizations and OVR customers. A link to the manual should be readily available on the OVR website. OVR counselors should be required to attend a percentage of local transition council meetings throughout the year. Response: We appreciate the comment and recommendation. OVR makes resource materials available on the agency's publications page on the website. OVR counselors strive to attend local transition council meetings when possible and as their schedules permit. • Section IV, Vocational Rehabilitation Programs, Comprehensive Statewide Needs Assessment, p. 133 – The Comprehensive Statewide Needs Assessment is going to collect data regarding Hiram G. Andrews Center and the effectiveness of the HGAC programs. DRN suggests that instead of evaluating the effectiveness of the programming at HGAC, OVR spend money developing additional Transition Programs at colleges across the commonwealth. These programs could provide similar experiences and training opportunities to those at HGAC, but would be provided in an integrated, community based setting as opposed to the segregated campus. Response: We appreciate the comment and support the importance of evaluating HGAC programs and services. OVR is supporting the development of Comprehensive Transition Programs (CTPs) in

Pennsylvania through the ACES Grant which was awarded to the DREAM Partnership. Currently, four institutions of post–secondary education are receiving funding to develop and implement CTPs on their campus: Millersville University; Mercyhurst University; Slippery Rock University; and Arcadia University. • Order of Selection, p. 136 – It is recommended that OVR review its order of selection definitions to determine if all individuals with the most significant disabilities are being served. The list of functional capacities should be reviewed. It is recommended that OVR track and re–contact those individuals who are found ineligible for OVR services during the fiscal year. Tracking this data should help OVR to identify barriers to service delivery. Response: OVR will maintain its current Order of Selection of serving eligible individuals with most significant disability (MSD). Throughout the year OVR senior management will evaluate and monitor the agency's available resources on a regular basis to justify the priority category within the order. Per federal regulations, OVR currently tracks and re–contacts individuals who are found ineligible for OVR services. All individuals who have had their cases closed in Statuses 08, 28, or 30 due to ineligibility will have a review of the ineligibility decision within one year of the determination when the ineligibility decision was based on medical factors; or, on the inability to achieve a vocational goal. The purpose of the review is to reevaluate the determination of ineligibility, considering new information and changes in the individual's condition which may have an impact upon his/her potential to achieve a vocational goal. The review process is also a means to determine whether or not the individual wants to have the ineligibility decision reconsidered and this process will allow full consultation with the individual. When closure is from Status 02 to Status 08, one review must be done within 12 months of the ineligibility determination. • Section IV, Vocational Rehabilitation Programs, State Strategies, p. 143 – Family education regarding the changes in placements to sheltered workshops is critical in ensuring that the intent of Section 511 is followed. DRN is supportive of family training and education opportunities and suggests that OVR partner with the Department of Human Services and Department of Education on a training strategy. Family and OVR customer education must include counseling and guidance concerning employment alternatives to sheltered work. Response: We appreciate the comment in support of collaboration and partnership between OVR, DHS and PDE. PDE is pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work and educational opportunities. • Pre–employment transition services, page 146 – OVR should include travel training in its list of expanded services for transition age youth. Travel training should not be limited to individuals who are low vision or blind and need orientation and mobility training. The ability to get to and from work safely is essential to successful employment, regardless of the disability. Response: We appreciate the comment in support of the plan. OVR agrees that travel training should not be limited to individuals who are low vision or blind and the ability to get to and from work safely is essential to successful employment. Travel training will be made available to OVR customers as outlined on their IPE. Susan Lyons, Eastern Monroe Public Library commented: Public libraries are free educational institutions that serve everyone in the community without barriers, prerequisites, or red tape. We are key players in training Pennsylvanians in basic job skills and assisting those who are seeking employment. I would like to see the Workforce Innovation report cover the role of public libraries in greater detail and also recommend greater support for the workforce development role of libraries, especially under Goal 2. At my library we offer weekly computer classes on topics such as: Introduction to computers and the Internet (2 classes – basic and advanced); Microsoft Word; Microsoft Excel; Resume preparation; Setting–up and using email; Tips for using smartphones, tablets, and laptops. These classes are small (six people – the number of laptops we could afford) and give our patrons hands–on experience in a safe, low–stress environment. Librarians teach the classes and the student–teacher ratio is 3:1. We began with a 6:1 ratio but found that a back–up teacher was needed given the mixed experience levels of our students. We follow–up the introductory classes by showing patrons additional training resources available through library databases and reliable online sources. Beyond the weekly classes, libraries assist patrons daily in using the Internet to apply for jobs. Like all public libraries, we provide free computer stations with Internet access and free Wi–Fi throughout the

building. Free computer and Internet access is critical in finding employment for many of our patrons. Most large retail employers (e.g., Wal–Mart, Target, Home Depot, Lowes) now require job applicants to apply for open positions online. In so doing, employers have effectively made basic computer literacy a job requirement for entry–level positions. In assisting patrons with these online employment applications, we try hard to give patrons the skills necessary to do it independently. This often entails helping the patron set up an email account and understand how to use it. They must also understand: how to use flash drives to save documents; how to create cover letters and resumes; how to use the spelling and grammar check features; and how to search the Internet effectively to find employment opportunities. This is time–consuming work but I think most public libraries would like to do more of it if we had sufficient resources to do so. Public libraries would welcome greater support from the Commonwealth in expanding our workforce development efforts. Response: We appreciate the comments about libraries that offer computer training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48. Mary Rennie, Erie County Public Library offered the following comment: We at the Erie County Public Library wholeheartedly welcome the release of Governor Wolf's Strategic Vision for Workforce Development in the Commonwealth of Pennsylvania. It is a strategy that is informed, straightforward, and realistic, in terms of analyzing the current workforce problems and challenges that face the Commonwealth, as well as identifying action steps for addressing these issues. Public Libraries are clearly aligned with the Governor's Strategies. In particular, Goal 1: Establish Career Pathways is a natural role for libraries. While the development of resources and tools will be important in accomplishing this goal, the more critical component will be the development of a successful, outcomes–based method of facilitation that connects people to them. This is where our existing statewide public library network—several hundred strong— connected by Commonwealth Libraries under the Pennsylvania Department of Education, will be key. • Strategically located throughout the Commonwealth, public libraries are well established and, for the most part, do not require capital startup funding or the creation of new infrastructure. • Libraries are welcoming and accessible—many of them open 7 days each week, and for multiple shifts. Simply put, we reach people. Visits to Pennsylvania libraries number in the vicinity of 50 million annually. There is no other existing institution that attracts this type of willing, expansive, and devoted participation. • According to the latest Pew studies, libraries connect broadly to every demographic—covering age, race, gender, ethnicity, education, socio–economic status and income. This includes those residents identified as a clear priority in the Governor's plans—those "with substantial barriers to employment." • Libraries are one of the oldest institutions in the history of humanity. As such, we are recognized "neutral" environments, and a welcome antidote to the "silos" identified as one of the main challenges within the Governor's Plan. The Commonwealth needs this sort of 'cultural glue' within each community, which is demonstrably able to unify existing providers and entities without being seen as a competitor. • The Strategy calls for public/private partnerships. With diverse streams of revenue already in place, libraries themselves ARE public/private partnerships. Additionally, the local leaders, who comprise our various Boards, provide the connections and linkages to other support structures located within each library's individual community. • Libraries already work closely and constructively with others on the local level. For us, collaboration is not a buzzword, but a service standard. At the Erie County Public Library alone, we partner actively with dozens of other leading individuals, institutions, agencies, and businesses. ideaLAB The Erie County Public Library (ECPL) is in the final stages of architectural plans for our ideaLAB – a space dedicated to fostering community partnerships, innovative programming, motivation, inspiration, culture building, combined with the availability of state of the art facilities, technology and equipment that will connect people with experiential learning opportunities that will enrich lives and strengthen our community. The ideaLAB will have direct impact on helping the Commonwealth meet the first workforce development goal of establishing career pathways. We have found that while our region may have tools available to help people reach self–sufficiency, the beginning steps of their journey are often the most

daunting. The Library serves as a natural “on ramp” as it is already a non–threatening, trusted community institution with a long history of helping people. The ideaLAB will provide a physical space in the Blasco Memorial Library with a dedicated staff focused on guiding patrons through the steps they can take to achieve their personal goals. Patrons will have the opportunity for facilitated direction which will focus on a basic skill inventory and creation of a schedule of library classes that fill any deficiencies. Community partnerships will be a crucial part of the success of this program. The next step will be to create a bridge to the community resources that can move the patron toward their goal. The library is currently collaborating with many local businesses and organizations that also have a mission of giving the community opportunities. While we are not interested in duplicating services, it is essential that we guide our patrons to local resources as well as collaborate with existing organizations to provide instruction to our patrons at the library. In this vein, the ECPL, and libraries across Pennsylvania, actively work to support access that is “enhanced through the use of technology and creative partnerships with community organizations and other service providers (WIOA, pg. 7).” Libraries are a natural first step on an individual’s career pathway and are already a trusted institution giving the opportunity to truly impact those most in need in our community. Libraries are perfectly positioned to provide widespread impact with locations across the state in key locations. The library serves as a natural lifeline to community resources, structuring ourselves around our missions, and through providing inspiration and motivation for all who cross either our physical or virtual thresholds build up the cultural capacity of our community. The library is where the 60% of households in Erie who do not have reliable internet at home are found using our public computers to apply for jobs, create resumes, apply for social services, take online classes, and search for information. In our libraries, as is the case nationwide, we find that a large number of individuals do not have the soft skills they need to complete these online applications and forms necessary to move them toward self–sufficiency. In the past, a staff member would guide these patrons to take a basic computer class at the library, or to meet with a staff member for resume help, but these initial steps do not solve the issues at hand. Therefore, we are currently developing a model that will help us lead our patrons through all the steps they’ll need to succeed with the ability to study their outcomes. To do so, we are developing a navigation service of following the patron from library to community resources to employment, working closely with them. We are very interested in the standardized WDQI reporting tool for measuring outcomes. A consistent measuring tool across the state could give us the professional reporting we need to show our community impact. As we work to develop a facilitated program, we are also greatly increasing our classes and programs with needs impact in mind. A sample of several on–going programs at ECPL illustrates how programmatic partnerships with public libraries support Goal 1.4 of the WIOA draft plan, and are beginning to lay the foundation to directly support outcomes anticipated with Goals 2.5, 2.6, and 3.4. : • Entrepreneurship Series o Ice House – helping the community develop an entrepreneurial mindset. (community partner – Innovation Collaborative) o IdeaShare – a meet up for people with ideas about new products, inventions, and businesses, facilitated by an established local entrepreneur o How to Start a Small Business 101 (community partner – SCORE) – Learn the basics about what it takes to start your first business • Employment Series o Ace the Interview (community partner – Erie Insurance) – learn job interview skills from an HR professional o Understanding LinkedIn o Beginning Resumes o So you want to be a… (variety of community partners) – Learn about unique professions from local experts • Tech Skills Series o Adult Coding Camp o Teen Coding Camp o Basics of the Cloud o Computer Classes, which include everything from Basic Computing, the basics of email and social media, to advanced software programs. • Additional Core Skills o Universal Class – online continuing education o BenchPrep – online career prep classes/resources • Workforce Development o Summer JAM –paid apprenticeship and internship program for economically disadvantaged school age youth (through age 19) o Provide summer employment with multiple employers across Erie County, including the County of Erie and the ECPL The Erie County Public Library is embracing the rapidly changing face of libraries and meeting our community’s needs head–on. We truly believe that the “future does not belong to the

faint–hearted, it belongs to the brave." The opportunity presented for libraries to engage as a full partner are vast, and it is essential that libraries are viewed as a vital partner in moving Pennsylvania forward. Thank you for this opportunity to share our contributions and partnerships on a larger scale and we look forward to next stages of this plan. Response: We appreciate your comments on the plans substance and clarity, the supporting roles that libraries could play and the articulation of the library's unique assets. We also appreciate the comments on IDEALab and the bringing together of local partnerships as well as the role the library plays in experience–based learning and serving as a starting point on career pathways, career preparation particularly for underserved citizens, and outlining the library's classes and programs that support improvement in workforce skills. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48. George Currie, Erie Press Systems offered the following comments: • Training Benchmarks: In general, it is concerning that the state's plan does not define training when talking about benchmarks. Title 1 dollars are currently utilized in the system to support many things including industry partnerships and employer services such as targeted job fairs. If the benchmarks are increased for training, I hope the definition would include things that are important to manufacturers such as apprenticeships and on the job training. In addition, it is the hope of manufacturer's that the training that is occurring with funding would benefit employers by providing the skills that are needed in the local area and/or commonwealth. Given the prominence assigned to working with and through Industry Partnerships as indicated throughout the state plan, we are concerned that building and expanding these partnerships provides no funding for IPs in NWPA as part of the 2015/2016 PA state budget. The lack of funding for IPs and the requirement that more Title 1 dollars to go for training will directly impact services of the PA CareerLink(R) offices. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmark of 70%: This benchmark is unlikely to provide employees that have the necessary skills to work in my manufacturing environment except at the lowest levels of the organization and at the lowest wage level. This benchmark will not help me fill the skills void that exists in my manufacturing business and our manufacturing area. It would be beneficial to the local Workforce Development Board to have the flexibility to meet the needs of the job candidates and employers rather than set an arbitrary benchmark for the entire Commonwealth. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Employer Services (p. 24 and throughout the plan): There is little discussion how this plan meets the needs of employers. In general, the plan does not cover many employer services. The focus is on funding which follows job candidates. The plan targets (70%) to candidates with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. There is some discussion about Industry Partnerships, but with the training benchmarks being proposed limited funding to support them. More concerning is the mention of high quality jobs with no definition provided. Is there a plan to provide priority of service to employers that pay high wages? How will this be determined? What happens to entry level jobs? Will employers be penalized for these positions These are the very positions that may benefit those with high barriers to employment. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. Stephen Marvin, FH Green Library, West Chester

University offered the following comment: I have worked with libraries for over 40 years many involved with direct programs to improve the business climate. In the Ridley Township Public Library I was hired to serve as the business librarian under a grant. As part of the duties, I produced a newsletter on new business titles, answered business reference questions, attended local area business meetings and attended state wide presentation on service to business with 3 workshops across the Commonwealth in Oil City, Penn State and Chester County Library.

Upon expiration of the LSTA grant at the Ridley Township Public Library, I became the Business and Government librarian at the Chester County Library. While there, I hosted the business tent for the Chester County Tri–centennial and an annual Salute to Small Business in Chester County. I continued to attend Chamber of Commerce meetings and provided early access via a grant to online databases with Dialog. Then moved to the academic world and became the fee–based Executive Library Services (Exels) at Drexel University Hagerty Library. (http://www.tandfonline.com/doi/abs/10.1300/J120v09n22_12). The service was abruptly closed under a new library administration. But the foray made in the business community was very impressive. The recognition included the Delaware Valley Industrial Relations Center and grants from the Commonwealth and the U.S. Defense Intelligence Agency. ExeLS became a NASA Application Center with networks to NERAC in Connecticut and SERAC in Gainesville, Florida. At this point I became more involved with work force development projects. Then became Director of the Dr. Michael Margolies Coatesville Area Public Library attending weekly Rotary meetings and advancing the community with acquisition of a satellite dish from the Commonwealth. After a stint with many corporate services, I became business subject specialist with the Dialog Corporation. Worked with the Work Force team of the DVIRC. Currently serving in capacity in the academic world again at West Chester University. Appointed by Hon. E. Z. Taylor as a representative to the Team PA Foundation started by Governor Ridge. TeamPA encouraged to have meetings while attending conferences or other business meetings in different areas of the country. I was able to meet Qualcomm in San Diego and AIP in Beijing China. As time permitted I have been active with the PaLA Association with government information services and electronic access to resources. All of this note is to convey the importance of library services to business and in support of the labor force. Unfortunately, Public libraries tend to be suspect by business groups who feel the library is part of the government administration. On the opposite hand, many companies feel wrong to utilized academic information services from libraries as they are not part of the licensed authorized user communities. Other companies embrace library representation in their professional associations such as the Chamber of Commerce and Rotary. Since my earliest recollection living in a very small town of 800 people, in high school I would take the bus to the library in Syracuse and borrow material and do research. Then at the end of the day, take the only city bus back home to my town and walk about a mile to get home. It was always and will be the realization that the library card is the first step with civic engagement with the community on a personal and intimidate level. Thank you for seeking input into your anticipated plans to enhance services to the business community. I hope this small testament will benefit an inclusive plan of action recognizing some of the inherent restraints the work force may have for using academic or public libraries. Response: We appreciate your comments about the importance of library services that support business and the development of a more highly skilled workforce and note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. Karen Kenderdine, FNB Wealth Management Trust Group offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could

result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Nathaniel Eddy, Free Library of Philadelphia commented: The Free Library of Philadelphia is looking to develop and launch innovative initiatives around workforce development that support entry level and low skilled jobseekers as well as special populations such as young adults with autism. We have a strong track record in providing traditional library programming targeted to jobseekers – resume assistance, job searching, interview techniques – and serve a population in great need of these direct services. A 2012 Pew report found that 29% of Free Library users come to the library to look for jobs and often, these individuals are low skilled and live in communities with high rates of poverty. Highlighted below are two initiatives – one proposed and one currently underway – that we feel demonstrate ways in which libraries can leverage already existing support structures and at the same time, develop more robust and innovative service models that foster greater opportunities for our diverse community of job seeking individuals. With funding support made possible through consideration in PA's Consolidated Workforce Development Plan, The Free Library will be able to launch the initial phase of the Job Readiness Training Initiative and grow and continue the work already accomplished in our Library Workplace Experience for Young Adults with Autism. Free Library Job Readiness Training Initiative Since the 1970's, the Free Library at Parkway Central has been the hub of services offered to jobseekers, first through the Lifelong Learning Center, and now at the WORKPLACE, which opened in 1988. Our neighborhood and regional libraries have also provided continuous support to this group of users through access to computers, one–on–one assistance, workshops on topics such as resume building, interview skills, and cover letters, host to numerous job fairs, as well as through material support and database subscriptions. Most recently, in May 2015, the Free Library created a new job class, the Digital Resource Specialist, to assist patrons in digital literacy skill building, much of which falls to the jobseeking category. This work, however, has never had a direct impact on the employability of our users. While the library has traditionally been extremely active in assisting individuals to find and apply for work, we do very little

as an organization to provide a pathway to employment. And although we highlight our efforts in workforce development as having contributed to “1000 jobs found” as reported in a 2010 Fels Institute of Government study, there is little hard evidence that supports this number. The Job Readiness Training Initiative seeks to bridge this chasm. In considering educational attainment requirements, entry level wages, regional hiring trends, and estimated openings, a job skills training program targeted to customer service and/or customer facing positions that require exceptional “soft skills” is proposed. This aligns with regional reporting that find just under 24% of Philadelphians hold a Bachelor’s degree and further demonstrates the needs of Free Library patrons with low skill sets and limited workforce experience. To launch an initial pilot, local employers will be identified and recruited to the initiative with an agreement to provide face to face interviews with successful graduates of the training program. In return, the Free Library will work to ensure all candidates meet employer job expectations and requirements of which, in addition to skills training, may include certifications, criminal background checks, and drug and child abuse clearances, among others. Candidates to the skills training initiative will be recruited through various channels such as advertising via our libraries, Free Library website postings, and email lists and is open to any Philadelphia resident with a valid library card. Course length and structure will be determined based on industry sector and employer need, however, should run no more than 6–8 weeks. Below are two sample training modules: • Customer Service skills Training: two week course designed to equip graduates for positions in retail sales and public facing positions. Open for 12 individuals • Professional Culinary Skills Training: in partnership with Community College of Philadelphia, curriculum includes the history of the industries, current problems and trends, business operations, fundamental cooking methods, proper kitchen and sanitation standards, food preparation and knife handling. Program graduates receive nationally recognized ServSafe Food Protection Manager Certification. Library Workplace Experience for Young Adults with Autism The Free Library is currently piloting a Workplace Experience for Young Adults with Autism at two Neighborhood Library locations. Working with MaST Community Charter School and SPIN, a Philadelphia based non–profit human service organization dedicated to providing quality services for children and adults with and without disabilities and their families in the community, the objectives of the pilot are threefold: to provide an internship opportunity for young adults with autism that allows them to gain valuable work experience; to develop an innovative model and alternative career path for individuals seeking career opportunities with the Free Library; and to further advance the Library’s ongoing effort to become a more welcoming and inclusive environment to individuals with autism. Through extensive research, communication, and work with various autism affiliated organizations here in Philadelphia, the library has learned the network of support services that exist for families and their children diagnosed with autism spectrum disorder drastically reduce once an individual enters into adulthood. The Free Library, in its effort piloting this initiative, seeks to provide greater job opportunities for those transitioning into adulthood and to be the first City agency to create a workplace experience for young adults with autism. Currently, four students from MaST Community Charter School have been identified and on–boarded through a 12 week, work–based learning course taught during Fall 2015 and led by certified staff members from SPIN. In February 2016, students will be placed in Neighborhood Libraries to begin their work based learning experiences and will be on site one day per week, four hours per day. Job coaches provided by SPIN will also accompany students to ease transition and will help facilitate orientation and develop socialization skills. Following completion of the assignments in June 2016, all students will be formally recognized for their contributions and have the opportunity to meet with representatives from the Library’s Human Resources Department to learn how to find and apply for jobs through the Civil Service process. Continuation of the program is currently under consideration for Fall 2016 and will demand additional financial resources to launch and grow. Response: We appreciate your comments about your library’s engagement in workforce development through support of individuals, especially entry–level and low–skilled workers and those from special populations. We also appreciate your further comments about the library’s job readiness training initiative and the sample training modules, and the library’s internship

program that provides work experience for young adults with autism. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. The Fulton County Commissioners offered the following comments: • Training Expenditures: Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce. While there is certainly value to upskilling the Commonwealth's workforce by increasing the number of individuals earning college degrees and industry recognized credentials, the workforce system encompasses much more than training. A careful review of the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, as well as the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area's federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year, the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response dollars in support of retraining, and each year a portion of these funds go unspent. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront and face of and for the delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Furthermore, considerable portions of our region are not serviced by high speed internet. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. The Georgetown Center on Poverty and Inequality submitted the following comments: Thank you for the opportunity to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for fiscal years 2016 through 2020. The Georgetown Center on Poverty and Inequality (GCPI) strongly supports the comments submitted by Community Legal Services (CLS) and the Community Justice Project (CJP) outlining the importance of allocating the full share of funding under WIOA that may be dedicated to transitional employment, a form of subsidized employment that focuses on transitioning workers into unsubsidized employment. GCPI works with policymakers, researchers, practitioners, and advocates to develop effective policies and practices that alleviate poverty and inequality in the United States. The center's areas of anti–poverty work include national, state, and local policy and program recommendations that help marginalized girls, promote effective workforce and education policies and programs for disconnected youth, and develop ideas to combat deep poverty. The center is in the midst of finalizing and publishing what may be the most extensive review to date in the space of subsidized employment and paid work experience programs (with a significant focus on transitional employment initiatives). The review, which includes a framework and recommendations for next steps in using these tools for helping workers—including youth—with serious or multiple barriers to employment, will be a valuable and lasting resource for policymakers and practitioners alike. Key findings from this forthcoming review, briefly outlined below, support this recommendation to use the full amount of funding designated for transitional jobs. Overview Under WIOA, states may spend up to 10 percent of Title I funds on providing transitional jobs opportunities, particularly for individuals who qualify for priority of service. Using the full amount of funding designated for transitional jobs in the state plan offers the Wolf Administration an opportunity to provide access to a promising strategy for boosting

incomes and improving labor market outcomes and well–being, especially for disadvantaged workers. Subsidized employment is a proven, promising, and yet underutilized tool for lifting up disadvantaged workers—particularly those in or at risk of poverty or with serious and/or multiple barriers to employment. Pennsylvania's proposed plan would give priority of service to such disadvantaged populations, including young adults who are not in school or working, individuals with disabilities, recipients of income supports, and people with criminal justice system involvement. These job programs can provide income support, an opportunity to engage in productive activities, and, in some cases, labor market advancement opportunities. They can also offer a platform for connecting people to other needed services, resources, and networks. In addition to promoting work among adults struggling in the labor market, subsidized employment programs can also help strengthen disadvantaged families. Key Findings and Recommendations for Subsidized Employment Forty years of experience suggests that subsidized employment programs warrant significantly greater attention from policymakers and practitioners. Despite their track record and promise, available funding for subsidized employment programs is meager when compared to the potential efficacy of and need for these programs. There is also evidence in the history of demand for these programs: the number of disadvantaged people willing to work has consistently exceeded the number in competitive employment. The significant voluntary participation in sizeable subsidized jobs programs over the past 40 years underscores the fact that, regardless of wider economic circumstances, the labor market leaves out large numbers of disadvantaged workers desiring employment. Therefore, the center joins CLS and CJP in calling for Pennsylvania to use the full amount of funding—10 percent—designated for transitional jobs. Below are some key findings and recommendations from the center's forthcoming report on subsidized employment that may be helpful/provide information in support of the proposed WIOA State Plan: 1. Subsidized employment programs have a wide range of potential benefits for Pennsylvania workers. First, these programs provide an important source of income to participating workers. Second, a number of experimentally–evaluated subsidized employment programs have successfully raised earnings and employment, with some programs providing lasting labor market impacts. This includes programs that have successfully been implemented in Pennsylvania, such as the Center for Employment Opportunities (CEO), which provides transitional work experience opportunities, including on–the–job training (OJT), to individuals with recent criminal convictions, and has recently opened a site in Philadelphia. CEO in New York City has been shown to reduce recidivism. 2. Subsidized employment programs can be socially cost–effective. In addition, subsidized employment programs with longer–lasting interventions and/or complementary supports may be particularly likely to improve employment and earnings. This pattern of high rates of effectiveness for programs with typical interventions lasting longer than 14 weeks—among rigorously evaluated programs—suggests that the role of benefit duration merits experimental evaluation. However, no research to date has isolated the impact of benefit duration within a subsidized employment program. Strong employer engagement, the provision of wraparound services, longer–term post–placement retention services, and other features of effective programs also appear promising as key ingredients and merit further examination. Other program design elements that may warrant additional experimentation include pre–training, program entry screening processes, job preparation services, matching processes, and peer support mechanisms. 3. The GCPI forthcoming report found that subsidized employment programs require further innovation to more effectively target specific population subgroups. This may be relevant for the Wolf Administration, as part of the Pennsylvania plan gives priority service to several subgroups, including individuals with disabilities. Specifically, the report finds that subsidized employment helps people with intellectual disabilities gain independence and earning power—and yet, the broader spectrum of disabilities remains understudied. Some unsubsidized employment models, like IPS (Individual Placement and Services) have been proven effective, and offer templates for subsidized employment initiatives as well. In addition, many efforts that have targeted youth and young adults have seen modest success with education and criminal justice outcomes, but have resulted in limited or no durable improvements in employment and earnings. Note that for

the youth–focused part of the State Plan, this is a particular area in need of innovation. 4. For Pennsylvania workers who likely can eventually succeed in the competitive labor market, subsidized employment should offer meaningful career ladders, a chance to develop skills through educational and training opportunities, and the possibility for advancement through increased responsibility and compensation over time. Also included in GCPI's forthcoming report is the recommendation to develop subsidized employment be in parallel with education and training initiatives that forge meaningful and sustainable connections between participants and the labor market. The center therefore strongly supports the Administration's commitment to ensuring that work–based training opportunities be "aligned with the Pennsylvania High Priority Occupation list to ensure that jobs are in–demand, have higher skill needs and are likely to result in family–sustaining wages," or, "in cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry–level positions that provide the work experience necessary to lead to employment in HPOs." As a result, multiple paths (as well as multiple entry and exit points within each path) with the ability to tailor specific programs and supports to particular participants should also be considered. Conclusion By increasing employment opportunities for disadvantaged workers, subsidized employment programs can be effective tools for the Commonwealth to combat poverty, persistent unemployment, and other undesirable social outcomes. The center commends the Wolf Administration's inclusion of proposed funding between 5–10 percent for transitional employment in the WIOA State Plan. As a result, in conjunction with the findings of the center's forthcoming report on subsidized employment and the recommendations of CLS and CJP, GCPI strongly supports the use of the full amount of funding designated for transitional employment. Response: We appreciate your comments in support of our emphasis on transitional employment opportunities. Dean Girton, Girton Manufacturing Company, Inc. offered the following comments: Thank you for this chance to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the period July 1, 2016 through June 30, 2020. Local input will help to refine this plan to meet the needs of all sectors of the Commonwealth. I have personally been involved in the state's workforce programs since the inception of WIA. Serving on the Central Workforce Board from the start, first as Vice–chair and then as Chair. I also served two terms in two administrations on the State Workforce Board. During this time I have seen many good changes in the workforce programs training our future and current employees. As an employer, we have benefited from the services of the CareerLink system and other connected services. They have help our company of 85 highly trained employees to compete in a very competitive international market for high–end cleaning systems for the pharmaceutical and food processing industries. The new WIOA law should enhance the effort even further. The requirements in this act promote local control because of the knowledge of local needs of the system. Thus, I am sure the state wants to implement this directive. With this in mind, I would like to point out several concerns I have with the proposed state plan (pages 10 and 67) and suggest recommendations: • An arbitrary rule of a flat 50% expenditure requirement for all WIOA Title I funds to be used for limited defined training does not consider local conditions. • Training occurs in the PA CareerLink® offices by subcontractor personnel that is critical to getting a future employee of mine the necessary soft skills to be able to get and hold a job here. This training is not supported financially by the new state plan. • The requirement for ITAs and OJTs to Priority of Service clients to be 70% of the cohort will drastically restrict the number of future employees trained as there are few clients of the system that meet the criteria. Today we are having trouble finding potential employees because of the lack of basic soft skills. • I am not speaking as a member of the local Workforce board when I point out that you would be taking more than one thousand potential employees out of training by the Priority of Service requirement. This will improve the chances for my Italian and Canadian competitors to employee a skilled workforce supported by their countries and deny our Columbia County citizens a job. I respectfully offer the following suggestions: 1. Foremost, define training in a broad sense as to not restrict it to ITAs and OJTs but to include the soft skills and other basic skills training provided by personnel at the PA CareerLink. 2. Recommend training targets to be set by local boards in

cooperation with county commissioners that align with the plan's goals but also account for local conditions. 3. Change the Priority of Service target to a more realistic recommendation as not to create an entitlement program for job seekers at the expense of local businesses. Thank you for allowing this input and giving consideration to my recommendations. I look forward to receiving a response to my suggestions. Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We do not believe the State Plan in any way limits training to only ITA and OJT. The commonwealth will be issuing guidance in the near future to include a definition of training, which will include multiple types of training beyond ITAs and OJTs. We will re–evaluate the priority of service target periodically to ensure that it is consistent with the Governor's overall workforce development strategy. Kevin O'Donnell, Greater Hazleton CAN–DO, Inc. offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. The Greater Reading Chamber of Commerce & Industry offered the following comments: The Greater Reading Chamber of Commerce & Industry is concerned that the PA WIOA Combined State Plan PY 2016–2019 will impede our local Workforce Development Board and Career Link to work effectively with our employers and local economic development agencies. The Greater Reading region has been designated as a distressed community. Our manufacturing and health care industries are struggling to fill even semi–skilled openings. A qualified and available workforce is critical to ensure our economic competitiveness. Our Chamber membership has relied

on the flexibility of our Workforce Development Board to prioritize and leverage available resources to address one of Berks County's major industry sectors, manufacturing. The shortage of skilled technical talent in our advanced manufacturing sector that provides family sustaining jobs with benefits has accelerated due to the retirement of skilled baby–boomer without qualified replacements. Many businesses have been forced to already turn away business opportunities. In Berks and our surrounding counties, current open positions for industrial maintenance/mechatronics technicians, CNC machinists, welders, etc. take 4–6 months to fill while more positions become open. We understand that this manufacturing skills crisis is a state wide issue which we would like to see clearly identified and given priority in the Economic Analysis (pp. 20–28) as well as in (Appendix XIV, p. 263) The proposed Title 1 Training "benchmarks" (p. 10) appear to mandate how funding is to be prioritized. In the past our local Workforce Development Board could effectively set our priorities to invest in targeted industries. From an employer's perspective, the funding stream provided support for critical business services, industry analysis, and strategic partnerships with employers and educational institutions. To ensure the available resources are effectively invested in jobs and local businesses, will help ensure economic vibrancy and spur large–scale community revitalization. It is important to sustained and grow businesses here in Berks County and PA. We appreciate your time, and respectfully ask your consideration for more flexibility with regards to how the state intends to prioritize and support the manufacturing sector and opportunities to expand the business – education partnerships that realized dividends at a local level. Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We also assure you that local areas will maintain the ability to prioritize industry sectors based on local needs. The Greene County Commissioners offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training will negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success

and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Harrisburg Area Community College offered the following comments: • The proposed WIOA state plan is not clear on its expectations regarding accountability and performance indicators. WIOA has a set of performance indicators that will need to be measured, however Perkins also has required performance indicators to measure. The conflict of these indicators is troublesome and, if implemented, will be overly burdensome. A more important fact to consider is that Perkins Reauthorization is expected shortly. It would seem to be a difficult task to rectify this issue now considering that we won't know for certain what Perkins V will require until it's reauthorized. Perhaps delaying the implementation of the statewide plan would be advisable so that these uncertainties can be adequately addressed. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan. • The proposed WIOA state plan specifies that there is required training from secondary and post–secondary institutions during the "transition" period. Details as to what that training is expected to look like would be beneficial so as to, as much as possible, provide similar training throughout the state. Considering that the training is to be provided locally, this lack of direction feels urgent because there are no best practices to provide guidance. Response: We appreciate the comment but are unsure what specifically the commenter is referring to and therefore do not offer a response. • Generally speaking, from a Perkins stand point, it would seem that more direction from the U.S. Department of Education would be helpful and beneficial to Pennsylvania's Department of Education. Knowing what the federal government wants from the state could provide some much–needed guidance in how to move forward with WIOA. Response: We agree that guidance from USDOL and USDE would be beneficial. Ray Overholt, Hermitage House Youth Services, offered the following comments: • Training Benchmarks: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General

Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs: NW PA WDB applied for and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements in advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (comments 5.1 through 5.7), ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and market penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions: It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks(R) it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for

effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System – Alignment Strategy: This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. The Housing Authority of the County of Beaver submitted the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Human Services Center Corporation offered the following comments: • Employment Second Quarter After Exit and Fourth Quarter After Exit: Specific to youth, the chart does not mention education (or the military) and yet many of our ISY will continue on to college. Furthermore, the State Plan clearly prioritizes post–secondary education in the goals and the economic analysis. So, will those who continue on to college be counted in this statistic and reporting requirement? Response: The placement of youth into education/training/military/apprenticeship will continue to part of the youth employment outcomes. • Employment Second Quarter After Exit and Fourth Quarter After Exit: The youth rates projected for 16/17 and 17/18 for second and fourth quarter are both set at unrealistically high levels. Longitudinal national studies document the success rate of this at–risk youth population to be significantly lower

even with engagement in a program. Furthermore, if you do include the college bound students, Federal Department of Education longitudinal studies as well as groups such as the National College Access Network note the first year drop–out rate of low–income students to be over 40%. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Employment Second Quarter After Exit and Fourth Quarter After Exit: If college bound students are counted in the youth statistic and reporting requirement, it should also be clarified if the conclusion of the spring term/semester will be sufficient evidence of retention as the end of the Fourth Quarter is June (a period that most college students are on summer break). Response: We appreciate the comment and will provide additional guidance upon finalization of WIOA regulations by the federal government. • Furthermore, if proof of college enrollment is needed, we would recommend that Student Tracker by the National Student Clearinghouse (a nationally renowned resource in college access) be recognized as one of the acceptable means to document a student's enrollment in college. Response: The commonwealth will consider the use of "Student Tracker" and other programs for proof of college enrollment. • Definitions of Eligibility: One of the basic eligibility requirements that an ISY could meet has been "An individual who requires additional assistance to complete an educational program or secure or hold employment, as defined by the local or state plan." There is no definition of this in the current version of the State Plan – will this be defined at the local level? We would encourage any definition to be broad enough to include a written letter from the high school counselor as sufficient documentation. Response: The commonwealth details on pages 87–88 of the final State Plan that '"Due to the uniqueness of Pennsylvania's 23 local areas and the varying levels of resources available, local workforce development boards will establish a definition, along with eligibility documentation requirements, for the "requires additional assistance to complete an education program or to secure and hold employment" criterion. This policy will be developed by each local board and will be required to be submitted to the commonwealth as a component of the WIOA Local Plan. To assist the local boards with this task, the commonwealth will convene panels of local representatives to develop recommendations on definitions and interpretations of the term "requires additional assistance to complete an education program or to secure and hold employment."' • An essential point to make in general about ISY and the new focus on retention at the end of the second and fourth quarter is that there needs to be additional funding for providers. This is a major shift from making follow–up services available to tracking retention which will require additional staff resources and thus funds. With no new funding available, local boards may need to re–assess how much they are paying providers per youth and how many people are being served. Response: The Department of Labor & Industry allocates WIOA Youth funds in accordance with federal requirements. Local flexibility allows local boards to utilize such funding in a way that fulfills the vision, goals and strategy of the local workforce development area, as well as meeting both Federal and state mandates. Additionally, local boards are encouraged to leverage these funds with other workforce funds to meet the needs of youth in their respective local areas. Dean Marino, InSpiriTec, Inc., offered the following comments: Many disadvantaged groups excluded from full employment have benefited from the emergence of information and communication technologies over the past 25 years. During the early 1990's InspiriTec's management team, working at the University of Pennsylvania, was among the first groups in the country to develop computer training courses for people with disabilities. This organization, the Center for Information Resources, was founded by IBM (and its Philadelphia customers), with additional funding by and partnership with OVR, and established at the University of Pennsylvania. Our innovative approach was recognized by the Wall Street Journal in 1997 for showing the potential of technology to "level the playing field" when it comes to developing meaningful employment opportunities for people with disabilities in the provision of commercial services. By 2000, InspiriTec had leveraged its technology and vocational rehabilitation expertise to open in–bound, complex problem resolution contact centers, while affirmatively employing large numbers of people with disabilities supported by Embedded Support services. This model was one

of the first social enterprise work strategies in the country and was recognized by the US Department of Labor in 2006 with its New Freedom Initiative Award for having a positive impact on employment for people with disabilities. Today, we employ 462 people with disabilities in Contact Center and IT Help Desk work for the US Department of Defense, US Army, Commonwealth of Pennsylvania, State of New Jersey and many commercial companies (PECO, American Dental, etc.). This work has created one of the most experienced and competitive teams in the field – a field considered by many to be a "nontraditional," yet a thriving, group of enterprises which affirmatively employs professionals with disabilities. From our unique vantage point, we see a bright future ahead for any individual with a disability who chooses to follow his or her employment dreams of a professional information technology customer service career earning competitive wages and benefits, and we stand firm in opposing any new regulation language that creates the potential to reduce choices presented to OVR consumers, especially choices to pursue work in the "High Priority Occupations (HPO)" like those created by InspiriTec over the past 25 years. Therefore, we support the current state WIOA plan draft's strong emphasis on offering OVR consumers informed choice in employment options, although we strongly recommend more clarifying language around this topic. As an competitive IT and Contact Center enterprise with a mission to advance employment for persons with disabilities, we both applaud and support both the policy and priority of "Employment First" as expressed in the State Plan. We believe that all efforts should be made to advocate for and effect employment in competitive–integrated settings in keeping with OVR consumers' strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice. And yet, woven throughout the state's WIOA plan are over 14 instances supporting the importance of offering "an array of service choices for OVR customers throughout the state." On the surface this is encouraging since we believe an individual must be provided every opportunity to make an informed choice consistent with the principle of self–determination, as we recognize the needs and desires of individuals who have disabilities are broad and diverse. Measuring "choice" or quality of choice, however, is sometimes where noble intentions create narrow–minded standards that become disconnected from the perspective of the OVR consumer's personal needs and interests resulting in a one set measure (sometimes labeled "preferred outcome"). We request more clarification around the concept of "informed choice" to include, but not be limited to, adequate information about the options that are considered, including: the opportunity to explore and discover the range of options; sufficient resources to support the choice; willingness to accept the choice and the reasonable risks associated with the choice; and information on the parameters of the choice and the relevant options considered consistent with the capabilities of the individual involved in the choice–making process.

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

opting for exploitive work environments with low expectations for performance and their contribution. (Often presumed by some in the civil rights community.) To the contrary, hundreds (if not thousands) of OVR referrals have come to see InspiriTec as just the opposite, which is why we have become a preferred employment choice among those seeking a professional information technology customer service career. Yet, the current language within the state WIOA draft plan, if not clarified, leaves considerable ambiguity around where certain work options, such as those with InspiriTec, would fit into the OVR prioritization. Indeed, our history demonstrates each time we launch a new contact center project the number of qualified OVR–referred applicants significantly exceeds the available openings. OVR consumers are not only choosing InspiriTec, they're stabilizing and maintaining employment with us while gaining skills to be promoted within and moving up to positions outside of InspiriTec. There is very little risk of retention failure relative to other competitive, integrated placements with outsourced supported employment services. This is because our work environment maintains BOTH the performance expectations of any large, successful corporate business and the Embedded Support services provided by our in–house professional case managers. In this way, OVR consumers are able to earn competitive, market rates in an environment that integrates performance expectations typically found in the community which produces a service quality also at a level typically found in the community. InspiriTec functions as a competitive, integrated workplace: • High Frequency Interactions with General Public. Each week contact center agents can have hundreds of interactions with the general public over the phone and via other communication tools. These interactions, like many aspects of a typical contact center operation, are measured and reported objectively in great detail. In fact, at least 75% of an agent's time is spent interacting with general public customers. Standing Federal WIOA language has acknowledged that interactions need not be face–to–face in the case of the at–home/self–employed worker (to be considered a competitive, integrated workplace). Therefore, it stands to reason that facility–based agents serving general public callers via phone and other communication channels are equally integrated in terms of their interactions with general public. o In the case of an average contact center, general public interactions are likely significantly higher than an average at–home, self–employed person. Not only are facility–based agents frequently interacting with the general public, they're avoiding the inherent risks present when people with disabilities work at home as they become excluded from any face–to–face interactions and supportive services. • Interaction and Exposure to Management and Supervision. Agents who work in a facility–based environment have a far greater opportunity for face–to–face interactions with supervisors, management, technical and executive colleagues. These opportunities provide far greater potential for professional growth and career advancement. Many InspiriTec managers and directors, many with disabilities, have gained career advancement within InspiriTec as a result of this level of interaction and exposure within a facility–based model. o Many IT and Contact Center work projects often have data and site security requirements that cannot be met by a workstation operated off premises. Such home locations limit work opportunities for home bound people with disabilities. • High Quality Interactions. Agents are engaged in diverse, non–repetitive communication tasks. Each caller served is unique presenting a wide variety of scenarios that must be assessed and handled using a variety of techniques and tools. Interactions require a two–way exchange of information, not a simple scripted greeting. These person–to–person interactions, which comprise most of the work effort and are typically found in other contact centers, require high level of both interpersonal and technical skill. • Serving Others Builds Self–esteem. InspiriTec positions are service jobs whereby our employees increase their esteem and self–worth by helping others in need and receiving gratitude and praise from those served. • Integrated Performance Standards. All agents, disabled or nondisabled, must meet the same performance standards as per our customers' contractual service level agreements. There is no exception. Many times InspiriTec takes over projects from large incumbent vendors such as HP, Serco, etc. and delivers the same level of service while employing predominately professionals who happen to have disabilities. • Common Office Space. The physical layout of our facility offers all employees shared conference rooms, lunch rooms and restrooms for management and staff alike. This is no area set

apart for individuals with disabilities to perform their work tasks. • Personal Work Space. All employees are provided with desks, cubicles or personal spaces where they may keep personal items. Workspaces are not arranged or designated or segregated by disability or any other distinction. • Facilities Location. Facilities are located in areas around other businesses and community services such as public transportation, restaurants, shopping, etc. Employees can and do easily leave the facility to go to lunch or for a break and enjoy other community offerings. • Competitive Employment. All employees earn competitive, market wages with benefits and opportunities for promotion. • Maximum Hours. We offer employment for the maximum hours consistent with the person's abilities and preferences, amounting to an average of at least 20 hours a week for all projects. • Embedded Support Services. As part of its unique business and operational model, InspiriTec provides scalable Embedded Support services to ALL employees. The purpose of InspiriTec support services is to remove all barriers for employees such that they can effectively perform at their jobs. Services can be directly disability related, such as assistive technology, or be support services and resources which are impacted by disability but not specifically disability related. Examples of the latter include: housing assistance, transportation, counselling, support for PTS and other mental health and behavior issues, domestic relations etc. InspiriTec's embedded support services are a part of the overall management structure and work closely with operational managers with the dual and shared goals of providing accommodations to employees to assure effective employment and career growth for our employees, while providing world class services to InspiriTec's contact center and IT customers. Response: We appreciate the comments and note that WIOA makes competitive integrated employment the preferred outcome for persons with disabilities. However, neither WIOA nor the state plan eliminates other options. Additionally, a number of InSpiriTec, Inc. employees shared personal stories: What OVR and InspiriTec mean to me: Without the referral from OVR I would not have the career that I have right now. Before working for InspiriTec I was already a consumer of OVR. I completed many job applications that did not result in a job. I was so happy to have the choice to go to InspiriTec through OVR. What InspiriTec has given me is self–confidence, a can–do attitude and support. The word disabled is something that I am still not used to even after over five years because we all are human not perfect but special in our own way. InspiriTec makes us more special by focusing on our talents not our physical nor mental disadvantages. Without OVR I would not have InspiriTec or career, a successful new and current life as a hard working woman. I am also surrounded by an extended family who is rooting for me. Susan Graham Hello, my name is Hope Sinnott and I work at Inspiritec. This has been a blessing for me. I have made numerous unsuccessful attempts at finding employment over a period of 3–6 years. Inspiritec is a great place to work. I started at OVR, and was able to go through job training from the Academy a program for people with disabilities. I updated my skills and was able to perform this job description, it is actually my Dream Job, I don't understand why more companies do not employ people with disabilities. We have a diversified group of people here working. I was able to get my Medical Coverage, and even a job coach who took the time to sit and help me, along with services provided that another employer wouldn't think of doing for their employees. Since working here I started a bank account, and I am learning about a 401K plan just like any other worker in Philadelphia. My family see's the effort I am making to improve the quality of life for me and my family, with Inspiritec I am able to do that. Some/A lot of companies have written us off as being useless and unemployable this is not so with Inspiritec, they see us differently as teachable and employable in several capacities, I wouldn't have the quality of life I have now, Imagine ME Hope Sinnott working, growing thriving in a paid position. I wouldn't have been able to live and progress as I do here. In all honesty I don't see why anybody would not want to help people, who are willing to help themselves and the company who believes in them. It would be very sad if an organization like Inspiritec didn't exist. My name is Princy Mathew, and I am a customer service representative at InSpiriTec. I am a Paraplegic due to a spinal cord injury from an accidental fall in December of 2009. Before then, I was a nursing student. My early days of being wheelchair–bound were difficult. I struggled with the pain, the isolation, and the sudden realization that my life was going to be different

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

am able to advocate for our organization and affirmatively support the culture necessary on behalf of our unique environment. Nadine Schaeffer My name is Donna M. Rodriguez–Canty. I work at InspiriTec, which is an organization that is an affirmative employer of people with disabilities. My work is important because as a disabled individual who has not been able to be employed with my diagnosis prior to this past year for a period of three years, I had been discriminated against because my diagnosis affected my work performance on other jobs and I could not sustain them without understanding employers who could accommodate me and understand my dilemma. I choose to work here because this company understands the diverse needs of persons with disabilities and don't feel as though I need to live a lie about my issue and am free to grow and utilize the assistance of the staff who can deal with me with empathy. If I didn't have this choice, I would probably be unable to maintain my bills, work in an environment where my skills are valued as a disabled person or maybe be in jail for not taking my medication due to depression because of my economic situation. Response: We appreciate the personal testimony offered by all of the commenters. The Institute on Disabilities at Temple University offered the following comments: On behalf of the Institute on Disabilities at Temple University, we thank you for this opportunity to comment on the proposed Workforce Investment Opportunity Act (WIOA) Combined State Plan. The team developing this plan has crafted a comprehensive plan that looks to maximize access to the workforce for people with disabilities by working to remove barriers and improve access. For more than 40 years, the Institute on Disabilities at Temple University has served as Pennsylvania's University Center for Excellence in Developmental Disabilities (UCEDD) Education, Research, and Service, established under the federal Developmental Disabilities Assistance and Bill of Rights Act. Further, the Institute, through our Pennsylvania Initiative on Assistive Technology (PIAT), has served as the Commonwealth's federally funded Assistive Technology Act program since 1992. We respectfully submit the following comments and recommendations. • Plan should detail available supports, timelines and process related to high school transition. It was difficult to assess from the plan whether there was sufficient detail about how support services related to transition from school to work will be arranged, funded and assessed. At a minimum we recommend that the plan detail the following: o OVR begins working with students with disabilities (on an individual basis, not just outreach and information) a minimum of 2 years prior to graduation. o The approach to individual transition planning has an objective of making the last day of school and the first day post–graduation look the same. Namely, students should have employment that they keep after graduation, not employment "slots" that the school maintains for currently enrolled students. o Blended or braided funding guidelines and responsibilities are outlined so that students/youth are not subject to delays in services and supports because of the "payor of last resort" disputes which historically have caused major delays. Response: We appreciate the comments submitted. PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities. • Establish in policy that Adult Training Facilities have no place in assessment or volunteer/work opportunities while in school or post–school transition. Adult Training Facilities are an archaic model of service and should be phased out of service in Pennsylvania. Response: We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. • Expand and Improve the Early Reach Initiative. Early Reach is an excellent initiative and the capacity of this program should be expanded by adding more counselors, increasing their role and providing additional and on–going training of these counselors. Response: We appreciate the comment in support of our Early Reach initiative. The Early Reach Initiative continues to expand throughout Pennsylvania reaching transition age students with disabilities students in public, private, charter, cyber and cyber–charter schools. Early Reach Coordinators continue to develop presentations and resources that align with pre–Employment Transition Services to prepare students with disabilities to work with OVR. • Build the capacity of PA's employment professionals to support people with the most significant disabilities and to address barriers to employment which are related to misunderstandings about the relationship

between SSA benefits and working. o The Combined Plan should lay out specific training strategies to build the capacity of employment specialists to successfully obtain and maintain employment for people with the most significant disabilities. o We know that a major barrier to employment for many people with disabilities is the myth/misinformation about working and loss of benefits. The Combined Plan does not address this need. OVR Counselors and employment service providers should have education and training on the fundamentals of benefits and work incentives. Further, as a state, we need more trained and certified benefits counselors to meet the demand. Our existing Certified Work Incentive Counselors cannot meet the demand for their services in a timely fashion. Response: We appreciate the comment in support of this strategy that OVR Counselors and employment service providers should have education and training on the fundamentals of benefits and work incentives. • Our understanding is that OVR's policies related to supported employment are being revised to reflect the new WIOA policies. We recommend that OVR's proposed supported employment policies are made available for public comment prior to adoption. Response: We appreciate the comment. Any State Board of Vocational Rehabilitation–approved OVR policy would receive public comment. • Because there are such significant financial implications, provide clear definitions for terms like "youth" and "graduation" and use consistently. The definitions and the attached delineations of funds available are confusing. To avoid confusion about roles and responsibilities and availability of resources, clarify the terms and the roles and responsibilities of each service system. We believe that employment opportunities and support need to begin while youth are still enrolled in school. Research highlights how youth with part–time job opportunities during the high school years are able to more easily move into employment after they leave school. Job readiness, social skills, and indicators of independence and quality of life are all increased with greater employment opportunities during the high school years. Additionally, we must ensure that these definitions and the way in which they are presented does not encourage people to push dis–enrollment from school to shift responsibility to OVR so that federal funds for both Out–of–School–Youth and Adults can be leveraged instead of funding from the school district. Response: We appreciate the comment and support the need to clarify terms and the roles and responsibilities of each service system, which will be done through program specific policies. Unfortunately, some definitions differ depending upon the program making it difficult to provide across the board definitions in the state plan. • Education for people with disabilities, families and school transition coordinators regarding changes in policy related to sheltered workshops is essential. Self–advocate and family education regarding the changes in placements to sheltered workshops is critical for Pennsylvania's compliance with the federal HCBS settings rules and section 511 as well as truly adopting an "employment first" policy. Further, transition coordinators in schools are often the people looked to for assistance with planning for life after high school. They must be well educated about the adult service system and expectations for employment. A comprehensive training and communication plan should be developed to ensure that people with disabilities, families and transition coordinators are well–informed about employment opportunities and supports. The Institute recommends a collaborative effort among PDE, DHS and OVR. Response: We appreciate the comment and recommendation for OVR/PDE/DHS to collaborate in the development of a comprehensive training and communication plan. PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities. • (Goal 2.10, p.12) This section references the policy of Pennsylvania as an "Employment First" state. Pennsylvania certainly should be an Employment First state but the Commonwealth needs an Executive Order or legislation to make this policy official. Pennsylvania should formalize the policy that we are an Employment First state and then address implications of being an Employment First State. Response: We appreciate the comment and agree that the commonwealth should be an "Employment First" state. An Executive Order was issued by the Governor on March 10, 2016. • (Section IV, Vocational Rehabilitation Programs, Coordination with Education Officials, p. 117) The Institute agrees with the Disability Rights Network of PA's comments and recommendations that "Under WIOA, OVR is reminded that it must re–evaluate that

youth on at least a yearly basis. We recommend that information concerning its written policy and procedure for the re–evaluations be followed on a statewide basis, tracked, and made available on OVR's website and/or to the Pennsylvania Rehabilitation Council, DRN and the Client Assistance Program (CAP), on at least a quarterly basis." The Institute also supports DRN's recommendation that youth who do not choose to apply for OVR services the first time they are approached be re–approached on at least a yearly basis. This information should also be tracked and shared as outlined in the previous comment. Response: We appreciate the comment regarding the importance of tracking and sharing information with stakeholders. OVR continues to explore and develop innovative services and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. • (Coordination, Alignment and Provision of Services to Employers, Page 50) The Institute supports the PA APSE concern about the following passage: "All Pennsylvanians exiting basic education services, both through the traditional K–12 system and through adult basic education, will be prepared to participate successfully in postsecondary level instruction with no need for remediation. To support this vision, Title II adult basic education providers are implementing the College and Career Readiness Standards for Adult Education…Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult basic education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution." Like the PA APSE we recommend that there must be a provision for students who are in special education who may not pass standardized tests. The development of training programs to get youth with significant disabilities 'ready' for work is something that we are moving away from as decades of experience has shown that this doesn't work (see PA APSE White Paper on Employment). We respectfully suggest that wording be included to create accommodations for those students that may not meet the qualifications presented above. Response: The statement referred to in the comment is specifically addressing the role of Title II adult basic education programs in supporting students in those programs to successfully participate in postsecondary education/training. The commonwealth recognizes that students who are in special education may require accommodations. • With regard to resources available on the Commonwealth Workforce Development System ("CWDS") (p.70–71), the Institute advises the online training be fully accessible, e.g. as part of the procurement requirements if the provider will be a source other than the Commonwealth. Response: In order to be ADA compliant, all training courses are required to be available in a variety of formats. The commonwealth mandates that all the PA CareerLink® centers provide reasonable accommodations, including programmatic accessibility. • Under Vocational Rehabilitation Programs, (p. 111 under 4.b.) make sure all communication is accessible. The text reads, in part, "all OVR web information to ensure that current brochures and publications can be provided in large print, Braille or read by using alternative speech recognition technology." [italics added]. The italicized phrase should state "able to be read by 'text to speech technologies'", referring to the technology that takes written text (as in a document or on a website) and provides speech output (e.g. JAWS). The reference to "alternative speech recognition technology" is incorrect; speech recognition technology is that which converts spoken words into text (not vice versa). Response: We accept the comment and will make the correction as outlined by deleting "using alternative speech recognition technology" and replacing it with "text to speech technologies". • With respect to the section titled "Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System," page 115 states: State programs carried out under section 4 of the Assistive Technology Act of 1998. Pennsylvania's Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, is Pennsylvania's statewide program under section 4 of the AT Act. PIAT has agreements with OVR to implement Pennsylvania's Assistive Technology Lending Library (not, as stated in the plan, "Temple University's Assistive Technology Lending Library") and as administrator for Pennsylvania's Telecommunication Device Distribution Program (not "Telecommunications"). This section of the

plan is meant to address programs carried out under section 4 of the AT Act: Although it is certainly a valuable resource and a subcontractor to PIAT, the Pennsylvania Assistive Technology Foundation (PATF) is not implemented under section 4 of the AT Act. Activities that are provided by PIAT, as Pennsylvania's AT Act Program, are: device demonstrations, device lending, device reuse, public awareness activities and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to OVR staff and clients (mostly at no charge). However, we believe it is the intent of this provision in WIOA to encourage collaborative fee–for–service arrangements between the OVR and the AT Act program. For example, the Oklahoma Department of Rehabilitation Services (DRS), as part of WIOA, has contracted with Oklahoma ABLETech for more than $200,000 of services ranging from accessibility testing, to demonstration centers in workforce development sites, to authorizing and monitoring all AT purchases requested through DRS. Response: We accept the comment and will make the correction as recommended. • Section titled "Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development", page 128 states: Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of: o (i) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; (emphasis added) and o (ii) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals. The response to this section does not make any mention whatsoever of using any resources of or collaboration with PIAT, the state's AT Act Program. Because WIOA requires collaboration with the AT Act programs, PIAT would welcome the opportunity to become more involved with the staff development with regard to assistive technology. Response: We appreciate the comment in support of our approach. OVR encourages continued collaboration with PIAT. • On page 141, the draft states "The Pennsylvania Assistive Technology Lending Library (PATLL) provides the opportunity for any Pennsylvanian to borrow and assess AT devices prior to purchase. The library is located on the HGAC's campus, and the services are free to all Pennsylvanians with disabilities." The statement should read: "Pennsylvania's Assistive Technology Lending Library, supported largely by a state appropriation and supplemented by federal funds under the AT Act, provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post–secondary education, or similar purposes)." Further, the statement needs to clarify that the centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location. The regional subcontractors of PIAT, the state's AT Act Program, facilitate the selection, borrowing, and use of these devices across the state. Response: We accept the comment and will revise the language on page 140 in part, excluding reference to the sources of funding. • On page 141, the plan states that a "separate policy related to the provision of AT services and devices has been identified as a needed guide for OVR to address the increasing demand for "off the shelf" technology to provide parameters to meet the AT needs of VR customers in a cost–effective and consistent manner." We propose that as the AT Act program for Pennsylvania, PIAT be a key collaborator in this effort, especially given the expertise of PIAT's credentialed AT staff. Response: We appreciate the comment in support of our approach and agree that PIAT should be a key collaborator. • Also on page 141, the plan states: "OVR collaborates with the Pennsylvania Institute on Assistive Technology (PIAT) at Temple University to participate in training, maintain the PA ATLL, and develop AT resources for Pennsylvanians with disabilities." The correct name for the state AT Act program is Pennsylvania's Initiative on Assistive Technology (PIAT) at the Institute on Disabilities at Temple University. We look forward to new collaborations with OVR to "develop AT resources". Response: We accept the comment and will make the correction on page 141 as

recommended. • Another possible inaccuracy is found on page 149, under “3. Educate staff on accessibility and technology based upon universal design principles.” The response includes this sentence: “The Center for Assistive Rehabilitation Technology Lending Library…” Please clarify: does the CART have its own lending resources? Or is this a reference to Pennsylvania’s AT Lending Library (although the centralized inventory for the Lending Library happens to be located at HGA). Response: We appreciate the comment. As a point in clarification, the CART does not have its own lending resources and any mention of this is in reference to Pennsylvania’s AT Lending Library. • In addition, we encourage you to expand on ways in which OVR contributes to universal design, including but not limited to web accessibility. PIAT is available to support and promote your efforts in this regard. Response: We appreciate the offer to support and promote this effort. Darlene Marshall, Jefferson County Library System and Mengle Memorial Library, offered the following comments: Please consider libraries as a full partner as you complete your Workforce Development Plan. After reviewing the Strategic Planning Elements and the Goals (pages 7 –19) it looked like libraries would be able to be incorporated into the plan as a partner although I didn’t see them specifically mentioned on these pages. Library’s provide wide hours and locations compared to job training centers, as well as one on one help and training for people trying to enter the work force or switch jobs. We see numerous people daily researching jobs, applying for jobs and they often need computer assistance. Libraries offer the following services: • provide one–on–one help with resume, cover letter and job application assistance • help patrons with technical issues when filling out online applications • provide free computer access for job searches and applications • provide free computer access for career development and advancement • provide printed materials for resume building and job searching • provide printed materials for career development and training • provide printed materials and online access for career planning • provide materials about local career training opportunities and resources • provide space for meetings and programs • provide services to target populations mentioned in the WIOA Patrons often come into the library for help looking for jobs online and then filling out the applications. Libraries are of special value to patrons who are older and need help with computer issues during their job search. Many of them feel more comfortable at the library than they would in a career center (we experience this regularly & maybe it is the ease of access to their local library). Libraries offer many varied aids to people looking to improve their lives, whether through education or career planning. They can offer assistance to the teen trying to learn about the advantages and availability of a future career or school, the job seeker trying to write an outstanding resume and cover letter, the small business start–up with questions about regulations, the adult thinking about a career switch or more training to advance in their chosen career, or the older person trying to get back into the workforce. One of the library’s great advantages is the availability of evening and weekend hours. These are a great help to people who may not be able to search for jobs during the regular daytime hours when most career centers are open. Public libraries are deeply involved with workforce readiness, technology, and the communities they serve. A study by the Urban Libraries Council reveals the significant contribution public libraries make to local workforce readiness, economic development, and literacy. View the study here at the following link, especially pages thirteen to seventeen cover opportunities libraries provide to workforce readiness: http://pages.careercruising.com/rs/509–UHL–105/images/Making%20Cities%20Stronger%20–%20Urban%20Library%20Council.pdf?mkt_tok=3RkMMJWWfF9wsRonvKzLZKXonjHpfsX96esoXKawlMI%2F0ER3fOvrPUfGjI4ASMdmI%2BSLDwEYGJlv6SgFT7DMMbVo1rgMWxQ%3D Response: We appreciate your comments about how libraries provide job training, computer skills training, and access to the Internet for jobseekers and businesses in your county, and about the library’s role with older adults who seek employment and how the welcoming nature of libraries helps to connect with people who may be struggling. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. JEVS Human Services submitted the following comments: • (State Plan p. 8) It is imperative that the workforce development system provide training for skills that lead to employment in High Priority Occupations (HPOs) or entry–level

occupations that lead to HPOs. Career pathways must be diverse with multiple entry and exit points allowing individuals of varying abilities, including low–skilled adults and youth with multiple barriers to employment, to have realistic access to pathways. Comment: The application of multiple entry points within career pathways is a very positive approach that we can operationalize for varying individual employment plans. Response: We appreciate the comment in support of our approach. • The commonwealth will mainstream job seekers with barriers to employment to the maximum extent possible by offering realistic entry points into career pathways and by ensuring necessary supportive services are in place and coordinated across agencies, so that those individuals with the most significant barriers to employment are successful in accessing and navigating career pathways. When appropriate, job seekers will be co–enrolled between core and other partner programs in order to provide the most comprehensive services possible. Comment: Ensure that targeted populations, including low–literacy individuals, non–English speakers, and other groups with barriers, benefit from the implementation of Career Pathways by implementing priority of service requirements; integrating wraparound services, literacy programs, and other basic skills education with training for specific Career Pathways that leads to paid employment, and conducting an outreach program that all stakeholders understand the components and potential benefits to individuals of advancing along a Career Pathway. Response: The commonwealth recognizes the need to have a variety of service providers working together to ensure that individuals with barriers to employment receive the services they need to benefit from career pathways opportunities. • The commonwealth will also support placement of individuals with barriers to employment into quality entry–level jobs that provide the work experience and non–technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry–level jobs can serve as “on ramps.” Comment: This strategy needs deeper acknowledgement that not all of those with barriers will be ready for career pathways as other areas of the plan address (i.e., 1.9). Also, sometimes an effective “on–ramp” may be just getting someone to work for 23 weeks – these issues need to be addressed as this strategy is honed and implemented. Response: We appreciate the comment and note the recognition of on ramps in Goal 1.7 and requirement that LWDBs expend between 5 and 10 percent of funds on transitional jobs, which may be appropriate entry points for some individuals with barriers. • The commonwealth will maintain a robust Eligible Training Provider List (ETPL) to include performance data for all students receiving training in all programs, regardless of the funding source for those students’ training. Comment: The commonwealth should offer an advanced timeline and clear approach to ensure necessary data integration and collaboration happens across all related state departments. Response: We appreciate the comment and will take it into consideration when establishing ETPL policies. • The commonwealth will require On–the–Job Training (OJT) and incumbent worker training, whether provided through WIOA core programs or the Industry Partnership program, to be tied to a career pathway. Comment: Unless the pathway is already an employer–defined one, this goal may be difficult to document and achieve. This strategy may also result in restricted funding to employers. If it were to be implemented, the commonwealth should be prepared to document pathways prior to beginning an OJT and nimbly adopt WIOA–compliant career pathways. This could result in a time and resource drain on staff and employers. Response: We appreciate the comment and recognize that career pathways need to be defined and refined over time. • The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set–aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. LWDBs may use other sources of funding, including Industry Partnership funding, to count toward and offset the Title I

training targets. Comment: Currently, Philadelphia spends 23% on training; this provision removes local control over the best use of Title I funds which currently support many critical services and supports beyond training. A training threshold of 30% (and eventually 50%) will have a significant impact on our programs. If we put 30% into training we will have to reduce the number served. The commonwealth should further consider how service delivery will be impacted by this shift and what will have to change within the workforce system to achieve these benchmarks. Title I funds are limited and other programs exist to support training. This provision is essentially requiring a need that may not exist for every individual. Customers may not be interested in pursuing training or may not be ideal candidates for training. Benchmarks for spending should be based on an initial analysis of outcomes. Consider setting a training target, analyzing the results, and phasing–in increased levels of spending rather than starting at a 30% mandate. Additionally, if this strategy moves forward, training should be defined as broadly as possible to include soft skills, which employers say is the number one need, and other types of training – not just degrees and tuition – and calculated based on training from other funds rather than only a Title I allocation. For those with barriers to employment, while it is positive to focus training funds on those with low income and other barriers, spending too much on training may actually reduce support available to those with barriers who may benefit more from working with staff on coaching, supportive services and work experience or internships rather than training. When working with individuals with barriers to employment and trying to incentivize that work, establishing funding benchmarks does not encourage the level of innovation that is oftentimes necessary to achieve this goal. Important to note that not every workforce development system is the same. Philadelphia, an urban area with high barrier clients, needs greater consideration and flexibility. The local WDB should have this flexibility in presenting a plan to the State. There should not be a hard number to reach, but a range of expectations. Furthermore this does not address the gap between the basic skills, specifically literacy and math, and the baseline requirements for job specific skills training in high demand occupations. Requests for training are not as scarce as people who qualify for available training slots. Remedial programs designed to address literacy should be strengthened and targeted funding for skills training that is open to low level literacy participants while including robust contextualized literacy components should be prioritized. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • The commonwealth will seek to obtain grants to assist in serving individuals entitled to priority of service and will additionally make discretionary state funds available to support the serving of these target populations. Comment: We commend this goal as an important one to pursue as it may offer more flexibility in service deliver to individuals entitled to priority of service and other target populations. More dollars are needed for serving priority of service individuals. We encourage that the state have a broad definition of what the 20% of funding for work experiences can include, so it can include activities such as staff time related to career advisement, career exploration costs, etc. in addition to youth wages. Response: We appreciate the comment in support of the goal of seeking additional grants. We will take the second comment under consideration in defining what work experiences can include to the degree not defined by federal law and regulation. • Recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (e.g. self–attestation, co–enrollment, career pathways and retention) to help local area staff successfully meet the needs of those individuals. Comment: We thank the state for adopting self–attestation of out–of–school youth status. This ensures that more OSY youth with significant barriers will be able to take advantage of services, since many of these youth may not have the documentation handy to prove they are OSY. Response: We appreciate the comment in support of our approach. • The commonwealth will work with the U.S. Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out–of–school youth being served within the commonwealth and in each local area. Comment: This position will allow all parties to have a more accurate depiction of

workforce activities and population groups within each area and would be helpful as long as the statistical model is sufficiently validated. We support this continuation to ensure enhanced support for youth and alignment between the multiple systems that touch youth. Response: We appreciate the comment in support of our approach. • The commonwealth will encourage the co–enrollment of high–risk OSY, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to allow for the leveraging of funds and provision of necessary services. Where appropriate, co–enrollment in Title II adult basic education services, EARN, TANF and other partner programs will also be encouraged. Comment: In order to maximize on this strategy, there needs greater concentration of efforts on the adult side (i.e., ages 18–24) in centers. Young males, especially black, young males, produce the lowest performance in common measures data. With a coordinated effort to offer them the full array of services available, we will support this group while helping common measures and aligning with state goals. We encourage the state to deeply consider what quality co–enrollment would look like and how TANF requirements can be amended to best support individuals entering and staying on career pathways. Response: We appreciate the comment and will take it into consideration in developing any co–enrollment policies. • The Department of Education (PDE) will make additional funds available to support the transformation and modernization of career and technical education (CTE) and align CTE with the career pathways recognized by the commonwealth. Comment: These funds must also be made available to the youth workforce system. Response: The state Education budget has a line item for CTE. The CTE line item as described in the state budget document indicates that the CTE line item is to support school districts and charter schools with approved CTE programs and career and technical centers. Students enrolled in CTE would benefit from JEVS services and perhaps JEVS could contact and work with the public schools. • Low–quality jobs have high turnover rates and limited opportunity for advancement, bringing into question the return on investment of limited WIOA resources. Comment: The term “low quality jobs” undermines the meaningfulness of every individual contributing up to their highest capacity. The quality of a job should not only be measured by the pay or complexity, but the intangible interpersonal, coping and creative skills that can be developed in any situation. Moreover, for people with disabilities, sometimes the job they secure is the only job they will ever have and they love it. The job is not a gateway, but an ideal match where someone with intellectual disabilities can stay for the long–term, keeping turnover low for the employer as well. Response: We appreciate the comment, but regrettably feel there are "low–quality jobs" and we are trying to reduce the number of them. • The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on–the–job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On–the–Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state– funded workforce partnerships to employers that offer high–quality jobs or jobs that are likely to lead to high–quality jobs. Comment: Some jobs include automatic increases based on a labor–management or apprenticeship agreement but may not meet the high–quality job standard at first and maybe not for a year or more. The critical emphasis should be on jobs that are likely to lead to high–quality jobs and not only high quality jobs. Response: We appreciate the comment and note in Goal 4.1 that we state "employers that offer high quality jobs or jobs that are likely to lead to high–quality jobs." We will amend the first sentence of Goal 4.1 to also note prioritization of jobs that lead to high quality jobs. • The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi–employer workforce intermediaries that serve employers with common skill needs in their local workforce areas. Comment: The Commonwealth funding Industry Partnerships and other multi–employer workforce intermediaries should continue to be required and supported. We encourage the Commonwealth to increase funding to support this endeavor. Response: We appreciate the comment in support of Industry Partnership funding. • Investments in workforce development programs will be made based on data and return–on–investment analysis. Comment: Local data needs to be considered when

developing a formula for ROI, as well as when analyzing trends. Response: We appreciate your comment and look forward to receiving stakeholder input as we move forward with the development of this analysis. • The commonwealth will also work with federal agencies and local boards to ensure that negotiated performance levels reflect the populations being served, particularly with regard to OSY and other high–risk youth and adults with barriers to employment. Comment: We support this strategy; the state should actively seek out for opportunities to engage the federal government in conversations that result in standards that consider those with barriers to employment. Response: We appreciate the comment in support of this strategy. • The commonwealth will embark on a comprehensive upgrade of the Commonwealth Workforce Development System (CWDS) and JobGateway® to provide for better job seeker and employer experiences and allow staff greater case management and performance accountability functionality within and across core programs. To the degree possible, the commonwealth will also look at ways to integrate CWDS with the case management systems of other partner programs. Comment: Linking CWDS to existing provider case management systems is an important direction for supporting greater access to and use of data among job seekers, employers and workforce professionals. Within the workforce professionals' category, we recommend highlighting the importance of supporting access to data among both providers directly serving youth, as well as intermediary providers that help to support youth providers in larger markets. Response: We appreciate the comment in support of this strategy and the recommendation to provide data access to direct and intermediary providers. • The commonwealth will evaluate available data including how it is presented and released, to ensure that job seekers, employers and workforce development professionals have the information necessary to make informed decisions. Comment: We are excited to see that data sharing and more effective use of data are a specific goal area in the plan. To strengthen this section, we would suggest that the plan place more emphasis on the importance of implementation data that can support greater understanding of program quality. By emphasizing program implementation metrics, providers and intermediaries have access to information that: can (1) help support program refinements, and also (2) ensure that providers are supporting quality experiences for kids that are more likely to lead to achievement of common measures. Response: We appreciate the comment and welcome suggestions of implementation metrics that would be beneficial to the system. • Table of Clusters: This table should include business, financial and insurance services. These are major clusters in many areas (Philadelphia, Chester, Lehigh, 3Rivers, etc.) Response: The commonwealth's industry clusters include Business Services and Real Estate, Finance & Insurance, both of which are represented on the Table. • Refining the Commonwealth Workforce Development System (CWDS), the system of record used by the commonwealth to collect participant data and report performance outcomes, to allow for more effective case management for job seekers, employers and agency and partner staff. This will include attempts to integrate CWDS with the case management systems of other partner programs. Comment: This would be a welcome change as it would allow for sharing information across programs, especially Title II providers and Title I providers as well as OVR, veterans and PHA. Response: We appreciate the comment in support of our intended approach. • Integration and alignment of workforce programs designed to serve specific populations and administered by other state agencies (e.g., programs for TANF and SNAP recipients operated by the Department of Human Services) with workforce programs administered by the Department of Labor and Industry. Comment: L&I has less experience developing programming for the challenges facing the TANF/SNAP populations. In order for this vision to be effectively realized, there must be meaningful information sharing and interagency training. Response: We appreciate the comment. DHS and L&I are committed to working together to coordinate programs to the benefit of our respective customers. • Another key aspect of cross–program alignment is well–trained staff. The commonwealth will support improved and more frequent customer service and cross–program staff training to increase staff knowledge and allow for better service delivery. Comment: The commonwealth should consider how it will develop and pay for this training. Response: We appreciate the comment. The commonwealth will explore the options to provide training through a

variety of delivery methods that are both effective and efficient. • WIOA Performance Goals for Core Programs Comment: We recommend that the state consider other high school equivalency tests besides GED as an acceptable credential counting towards performance. Since the measurement periods for the Employment, Retention, and Median Earnings, historical data is unknown the state should make this data available in order to effectively negotiate at the local level. Both the measureable skills gain and employer effectiveness are unknown and it will be important to figure out how to measure them. We applaud the idea of more realistic goals, to reflect increased services to those with barriers to employment. Especially for youth, we want to allow paystubs as a validation source for employment placement and retention. Response: We appreciate the first three comments and will provide additional guidance upon finalization of WIOA regulations by the federal government. In terms of the last comment, WIOA requires the use of quarterly wage records for the determination of employment placement and retention. • Provide advice, ideas and support on the development and implementation of the commonwealth's workforce goals and associated initiatives. Comment: Recommended additional language: "Comment on commonwealth policy and guidance before it is implemented using local constituents as sources of feedback." Response: We appreciate the comment and can share it with the State Board for consideration should they wish to amend their by–laws.

• As discussed in the strategic section of the plan, the commonwealth will establish minimum requirements for PA CareerLink® career services orientation, minimum requirements for PA CareerLink® basic career services customer flow, a customizable initial intake/assessment/triage form, and a customizable template for developing Individual Employment Plans. The state also held statewide meetings to discuss operation of the PA CareerLink® centers and has arrived at processes for providing and aligning services including Perkins postsecondary partners and additional workforce programs. This will ensure a level of consistency across regions and support alignment of services across programs by reducing duplicate data collections and allowing partners to all work from the same basic customer information. This is an issue that we will need to monitor closely and adjust our service delivery model accordingly. Comment: It will be important that customer information be full enough to evaluate any intervening factors that lead to success or stumble for customers in multiple systems. This should also help with co–enrollment and coordination across WIOA Titles and other workforce programs for people with barriers. Response: We appreciate the comment and will take it under consideration in developing the requirements and forms referenced. • Applicants for Title II funds will be required to describe how they will align services with the local workforce development plan. To support the commonwealth's goal of increasing opportunities for youth, funded programs will be encouraged to co–enroll out of school youth by providing basic skills instruction. Funded programs will provide integrated education and training whenever possible and appropriate. Furthermore, the commonwealth will develop policy and guidance governing the use of Title I training funds and other funding sources to support the costs of the workforce training component of integrated education and training opportunities, including both pre– employment and incumbent worker training. Comment: Aligning Title I and Title II funds are important, however, the commonwealth should offer ample flexibility for local differences in writing guidance and/or policy. Response: Guidance and policy will be written to allow for flexibility to meet local needs while addressing the requirements of the law and federal regulations. • An interagency work group has been established and meets on a regular basis to consider ideas, discuss agency initiatives and goals and how partner agencies can help in achieving them, and share best practices. Additionally, DHS, DCED and the Department of Agriculture have recently added Special Assistants focused on workforce development initiatives, all of whom participate in the interagency work group and help in facilitating alignment of activities. Comment: The addition of Special Assistants focused on workforce development to DHS, DCED and the Dept. of Agriculture is appropriate. It would be useful to include language that will explain the operationalization of the interagency workgroup and how the LWDBs will inform and interact with this group. Response: We appreciate the comment in

support of the addition of Special Assistants. The interagency workgroup will interact with LWDBs on an as needed basis. • PDE will partner with the DOC to improve coordination of resources and systems at the state level, including providing professional development for Bureau of Correction Education (BCE) staff on key issues such as career pathways, rigorous academic standards, and the development of college– and career–ready skills. Comment: This is an important strategy that would improve placement prospects for those with criminal backgrounds. Response: We appreciate the comment in support of this strategy. • The Pennsylvania Workforce Data Quality Initiative (PA–WDQI) is an integrated data platform that links human service, workforce and wage record data to measure the outcomes of workforce development programs and identifies the supply of skilled workers in relation to employer demand. Comment: Local areas need a commitment to access as well – not just state level agencies. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. • Trained and informed staff is another critical element to providing comprehensive, high–quality service. An expanded curriculum of standardized courses, technical courses, conferences and workshops enhance knowledge, skills and the professional development of workforce professionals in PA CareerLink® centers, LWDBs and partnering agencies and promote a collaborative and consistent service delivery through information exchange and learning. Comment: This strategy would be more effective if the state offered a measurable level of implementation (i.e., 2 trainings available to all local areas per year). Response: We appreciate the comment and will take it under consideration. • The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, other services must be secured through partner programs and community and faith–based organizations. Comment: The commonwealth must make sufficient funding available across all programs to have a good outcome from leveraging programs. Otherwise we just serve fewer and fewer residents in order to meet minimum standards as defined above. The provision of supportive services to individuals with barriers to employment makes sense. It is encouraged that the commonwealth provide increased funding to support this initiative. Volunteers from faith–based communities can also be recruited as mentors. Response: We appreciate the comment and will continue to seek ways to access and leverage funding for supportive services. • BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post–secondary providers who can serve as a source of talent for employers. Comment: This topic should also acknowledge the important convening role of local boards at the local level. Response: We agree that local boards play an important convening role at the local level. This information will be captured in regional and local WIOA plans. • The Pennsylvania Department of Education’s secondary and postsecondary career and technical education (CTE) programs will collaborate and partner with employers who will assist in: informing and developing career pathways for targeted HPOs; developing work–based learning opportunities for CTE students and career exploration activities for middle school students; developing pathways to high value industry certificates and credentials; developing a system of micro–credentials; and improving STEM focused career exploration. Comment: We applaud the recognition of career exploration activities for youth. We recommend that performance measures also recognize the value of these activities and that ample time is given to programs to implement these activities. Response: We appreciate the comments in support of career exploration activities for youth and the suggestion that performance measures be implemented to recognize the value of these activities. Career exploration activities are not appropriate for WIOA performance measures since most students participating in such activities are outside of WIOA’s targeted populations.

Performance measures under Perkins for career exploration activities will be adopted as appropriate. • The core programs will work with the education system to support and develop career pathways identified by employers and the workforce system. The commonwealth is partnering with seven community colleges to develop micro–credentials that demonstrate measurable skill gains and are part of a clearly defined career pathway for individuals with barriers to employment through a Workforce Innovation Fund (WIF) grant. Comment: Micro–credentials are essential for youth gaining stackable credentials. We applaud this inclusion and encourage the state to use micro–credentials to count towards performance measures. Tying them exclusively to defined career pathways, especially for individuals with the most barriers seems unnecessarily limiting. Response: We appreciate the comment in support of micro–credentials. The approved grant calls for micro–credentials to be tied to career pathways. We will consider the comment in any future micro–credential efforts. • Additionally a number of LWDBs are considering the use of Executive Pulse to aid in coordinating business engagement between workforce and economic development partners on the regional and state level; the commonwealth encourages this coordination. Comment: We appreciate the coordination that the commonwealth encourages as it will be helpful to access this CRM at a reduced licensing cost. Response: We appreciate the comment in support of this effort. • The commonwealth, LWDBs, and PA CareerLink® centers shall provide priority for Title I individualized career services and training services… Comment: This language should clarify that this applies only to Title I Adult services and not dislocated worker services. Response: We have revised the plan to clarify that priority does not apply to Dislocated Worker services. • “Individual who is basic skills deficient” means an individual who is: (i) a youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test Comment: Because of the priority of service application, this should specify the age group for youth as 15 or 16 years or older; a 14 year old might still be in 8th grade. Response: We appreciate the comment and understand the point that a 14 year old youth may still be in 8th grade and thus reading at an 8th grade level would not indicate basic skills deficiency, but note that the definition mirrors the definition in WIOA. • In their local plans, LWDBs and PA CareerLink® centers will be required to state the additional methods by which they will apply the WIOA priority of service requirements and the commonwealth’s policy regarding priority of service. Comment: We will have to develop new procedures and a means of tracking for reporting purposes. Adherence to this must also now be a part of future contracts. Operationally, at the center level, it may also be difficult to implement priority of service on the spot for workshops, career fairs, etc. We find this to be true, particularly for group events. Response: We appreciate the comment and will take it under advisement. We will also look for ways to provide technical assistance to help implement priority of service requirements. • LWDBs and PA CareerLink® centers will be required to use between 5 percent and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. Comment: The state should offer more flexibility. Each WDB should be able to determine whether and how much funding to dedicate to transitional jobs programs vs. other interventions for Priority of Service groups as transitional jobs under WIOA are an optional program component. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. • The commonwealth plans to use a portion of Governor’s set–aside funds to support the creation of an Office of Apprenticeship (OAT) with the goal of promoting and growing Registered Apprenticeship (RA) and pre–apprenticeship programs across the state. The OAT is described in greater detail in the response to how the state will incorporate RA into its strategies and services. Comment: We applaud the state’s decision to use some of the Governor’s set–aside money to support apprenticeship and pre–apprenticeship programs (particularly non–traditional apprenticeships) and to support services for out of school youth. Response: We appreciate the comment in support of our approach. • In cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry–level positions that provide the work experience

necessary to lead to employment in HPOs. Comment: This is critical if work experience is to provide the resource for those who are further from entry level employment in a career pathway. Response: We appreciate the comment in support of our approach. • All registered apprenticeship programs are required to provide the following information to the Department as part of their procedures for inclusion on the statewide eligible training provider list: o Occupations included within the registered apprenticeship program; o The name and address of the registered apprenticeship program sponsor; o The name and address of the related technical instruction provider, and the location of instruction if different from the program sponsor's address; o The method and length of instruction; and o The number of active apprentices. Comment: Because this requires additional reporting, there should be a standardized process/forms. Response: Thank you for your input. As the Apprenticeship program is integrated into the Eligible Training Providers list and the CWDS system, updates will be provided to the field on the process to apply/renew/report on this new requirement. • Considering the tailoring of strategies for young adults by age group, 18–21 and 22–24… An emphasis on available work experiences and employment services, rather than education and basic skill building, is preferred for this older group. Comment: The emphasis on available work experiences and employment services rather than education and basic skill building is contrary to methods that we have employed. We seek to engage youth of all ages by emphasizing and prioritizing education that is connected to work experiences. Furthermore, these ages are quite close. The assumption that all 21 year olds should be prioritized toward education and all 22 year olds would be better with work experience just isn't reality. Some 18 year olds need work experience and many 22 year olds still need the focus on education. Response: We appreciate the comment and note that the emphasis is encouraged, not mandated. Local providers should certainly provide services that best meet the needs of the individual customer. • If a participant disengages from the program at any point, calls, texts, visits and messages on social media are ways to find out why the participant is no longer engaged and let the participant know that he or she can return whenever he or she is ready. Engage adult mentors along with case managers. Such mentors can play a key role in keeping participants engaged with the program. Comment: The commonwealth should create a clear definition of what qualifies as sufficient outreach. This change may be problematic and evolve into the same challenges as the EARN program currently faces. Response: We appreciate the comment and will take it under advisement as policies are developed. • An applicant will become eligible for youth services by providing a statement that addresses the required element that may make the applicant eligible to receive services as an out–of–school youth, signing and dating a form acknowledging this status, followed by verification conducted by workforce staff that such information meets WIOA eligibility criteria for out–of–school youth. The key elements for self–attestation are: the participant identifying his or her status for permitted elements and signing and dating a form attesting to this self–identification. The commonwealth will work with LWDBs to develop additional self–attestation policies and procedures that are consistent with the commonwealth's self–attestation policy. Comment: This clarity is helpful and provides stronger guidance. Response: We appreciate the comment that this clarity is helpful. • Local areas are strongly encouraged to employ single–year provider contracts with the inclusion of a renewal option for additional years, rather than multi–year contracts. Comment: One year contracts can make it difficult to determine consistency in staffing, etc. Response: We appreciate the comment and note that we are merely encouraging single–year contracts, not requiring them. • Due to the uniqueness of Pennsylvania's 23 local areas and the varying levels of resources available, local workforce development boards will establish a definition, along with eligibility documentation requirements, for the "requires additional assistance to complete an education program or to secure and hold employment" criterion. This policy will be developed by each local board and will be required to be submitted to the commonwealth as a component of the WIOA Local Plan. Comment: This offers a very short time period for local areas to finalize a local policy approved by the board. Response: We appreciate the comment but feel, particularly with the extension provided for submitting local plans, that this requirement is feasible. • To assist the local boards with this task, the commonwealth will convene panels of local representatives to develop

recommendations on definitions and interpretations of the term “requires additional assistance to complete an education program or to secure and hold employment.” Comment: More guidance is better for these definitions. Response: We appreciate the comment. • Every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the “Agricultural Specialist.” Comment: For Philadelphia, sharing a regional representative makes more sense as the need is not as present. Response: Please note that, according to the plan, the Agricultural Specialist may have other duties. These “Agricultural Specialists” are used for specific agricultural purposes and used only as needed. There is no duplication or redundancy of services, and therefore there is no additional incurred or inefficient use of training resources. One duty of the “Agricultural Specialist” is to write H–2A job orders into the system and to manage those orders. These orders are specific to that location, and for that reason each PA CareerLink® in Philadelphia needs its own individual designated as an Agricultural Specialist. • As part of the application process, applicants will be required to submit their applications to the LWDB, which will review the applications for alignment with the local plan. PDE will provide opportunity to the local boards to provide recommendations and will take the recommendations and results of the review into consideration when scoring the related sections of the applications. Comment: Local boards may not meet in a way to easily approve or recommend providers. Perhaps a committee of board and other stakeholders could make the recommendation. Response: Section 108 (d) of WIOA states that one of the functions of the LWDB is to review applications for Title II funds to determine alignment with the local plan and to make recommendations to promote alignment. The local board is free to appoint a subcommittee or stakeholder group to advise it on scoring applications but the full board must make the final decisions. • The commonwealth will develop policy and guidance further clarifying allowable and required activities in an integrated education and training program. In addition, the commonwealth will research funding opportunities to cover the costs of the occupational training whenever possible. Comment: We support this as it would help expand the system. Response: We appreciate the comment in support of these intended actions. • Applicants will also need to provide evidence of communication with and input from the LWDB and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program. Comment: We support coordination between Title II and WDBs. Response: We appreciate the comment in support of this coordination. • Applicants will also need to provide evidence of communication with and input from the LWDB and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program. Comment: We support coordination between Title II and WDBs. Response: The commonwealth will investigate a variety of models when establishing priorities for this activity. • Further, the Division of Adult Education will apply an additional performance measure: the number of outcomes achieved per student; Comment: On its face, this measure looks to be a good way to see if students are achieving multiple outcomes (skill and credential enhancement) as well as employment. Response: We appreciate the comment in support of this measure. • OVR is optimistic that this program has the potential for statewide replication. Pennsylvania has 67 counties, 15 OVR District Offices, and 85 Career & Technology Centers. Comment: We support the replication of Berks County’s school–to–work transition program for CTE students with disabilities. Also SAP in Chester County hires autistic youth (18 and older) to learn programming. It is important that students with disabilities get access to work and pipeline development opportunities. Response: We appreciate the comment in support of replication of this model. • Enhance collaborative relationships with DHS, PDE and higher education. Comment: Although the law requires that all those with IEPs or Section 504 agreements have to begin getting transition services at 14, almost no local areas are compliant. Thus young people with disabilities are not prepared for post–secondary education or the workforce. Response: We appreciate the comment. Updates in the Rehabilitation Act of 1973 as amended in the Workforce Innovation and Opportunities Act of 2014 prioritize “Pre–Employment Transition Services” for students with disabilities ages 14 –21. OVR has expanded its service definitions to include “Pre–Employment Transition Services”. • Individuals will be able to access

WIOA services such as training programs aligned with a career pathway, an On–The–Job training program or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed. Comment: If funding for transitional jobs is to come out of the WIOA/CL contracts, it seems to demand that those transitional jobs be jobs in the CL to help mitigate the staffing shortage we already face. Response: If local PA CareerLink® centers are able to coordinate a Transitional Jobs program, that would be a great opportunity for individuals to be exposed to the world of work. The strategy for the implementation of a Transitional Jobs program will be a Local Workforce Development Board decision. • The PA CareerLink® centers will also help individuals participate in job fairs and other employer recruiting events. Individuals with multiple barriers will receive priority of service designation so training services can be readily available. Comment: Again, individuals with multiple barriers can be prioritized but they still won't qualify for existing training opportunities. Response: We appreciate the comment and encourage Local Workforce Development Boards to develop training programs for all job seekers in need of additional skills to secure employment. We are unclear why individuals with multiple barriers will not qualify for existing training opportunities. • Generally speaking, the AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in the Commonwealth Workforce Development System (CWDS); PA CareerLink® staff refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co–enroll eligible individuals in WIOA, OVR, and Veterans programs to more efficiently use federal and state workforce development funds; co–locate SCSEP staff at the PA CareerLink® centers on a full– or part–time basis; and co–locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives. The SCSEP is represented on all 22 Local Workforce Development Boards in the commonwealth by AAA directors, AAA SCSEP staff, national SCSEP operators, and county human service agency directors. Comment: This is always good for all concerned. Response: We appreciate the positive comment. • The DOC proposes a collaborative partnership with the State Department of Labor & Industry via an REO workgroup. This coordination on DOL Reentry grants would be positive, but L&I should include local WDBs in the workgroup or through consultation. The REO grantee in Philadelphia currently is Connection Training Services. We usually receive 2 or 3 requests for letters of support for REO grant proposals annually. Response: We will consider inclusion of LWDBs in the workgroup. • Competitive grants to multiple Industry Partnerships in a specific cluster (e.g., advanced manufacturing, health care, logistics and transportation) that agree jointly to develop and use sector–specific benchmarking tools that track the impacts of strategic workforce investments on employer outcomes. (Outcomes might include turnover in long–term care, scrap rates and uptime in manufacturing, and on–time delivery in logistics and transportation.) These tools would be another way to encourage sector partnerships to tackle higher–order organizational improvement issues with a potential to increase the return on investment. Comment: Employers may find these invasive and stop participating. The goal is to help employers engage. Response: We appreciate the comment and note that application for these funds would be voluntary. • Develop a certification process for Sector Partnerships. Businesses often use organizational certifications, such as ISO standards, as tools for improving organizational performance. Workforce intermediaries could similarly benefit from a certification process. Certification might be particularly valuable to improve partnership governance, e.g., by making partnerships more employer–driven and less staff–dependent. Certifying partnerships would also open up the possibility of using certification as the basis for eligibility for partnerships to qualify for additional or continued state funding. Comment: This provision aligns with current sector strategies. Response: We appreciate this comment. Judith Creed Homes for Adult Independence, Inc. submitted the following comments: Judith Creed Homes for Adult Independence, Inc. (JCHAI), a Pennsylvania provider of independent living services for adults with intellectual disabilities and autism and RespectAbility, a national nonprofit focused on best practices on WIOA, respectfully

submit these comments on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. Governor Wolf and the taskforce that has created this plan have clearly studied the issues surrounding workforce barriers for people with disabilities and done an admirable job in creating a vision and plan for helping to surmount these barriers. Our group offers these suggestions to help make Pennsylvania a leader in employment for those with disabilities. We were heartened to see the Commonwealth's commitment to Employment First principles. Competitive, integrated employment for people with disabilities is an essential goal for Pennsylvania. When looking at the numbers of people in Pennsylvania with a disability, their employment rates, and their dependence on entitlement programs, it is easy to see why your work is so important. This chart lays out statistics that lead to the inescapable conclusion that expanding job opportunities for people with disabilities is a win–win–win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. The Plan from does well in focusing on certain key elements for improving employment for people with disabilities: • Beginning training for people with disabilities at an early age, focusing on ages 14 and older (see, e.g., pp. 108 et seq.). • Including people with disabilities on Citizen Advisory Committees (p. 110) • Setting the tone for employment of people with disabilities in government agencies (p. 112) • Focusing on Industry Partnerships and Sector Strategies (Appendix XIV). • Including the Labor Force Participation Rates of people with disabilities in the "summary of Pennsylvania's labor force for 2014" (p. 22) However, Pennsylvania has a lot to accomplish to improve our ranking in the country for employment of people with disabilities. Pennsylvania ranks 30th in the percent of people with disabilities employed (and these statistics include those employed in sheltered workshops and/or only working part time) (See Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium). Pennsylvania ranks 34th by the employment gap between people with disabilities employed versus people without disabilities employed. See id; see also http://disabilitycompendium.org/archives/2014–compendium–statistics/employment Response: We appreciate the support of Employment First principles. We also appreciate the comments in support of key elements of the plan. The commonwealth shares the commenter's goal of increasing the number of persons with disabilities employed. PDE will collaborate with OVR to develop a training strategy to help IEP teams in school districts incorporate Employment First principles into work, education and transition plans for people with disabilities ages 14 and older. • Consider and Outline More Specifically the Types of Jobs that Are the Goal for People with Disabilities: Much of the emphasis in this plan is given to High Priority Occupations (HPOs) or entry–level occupations that lead to HPOs. See, e.g., p. 8. Furthermore, the HPOs are considered most desirable because they lead to family–sustaining wages. See, e.g., Section 1, Goal 1, p. 9. For people with disabilities, especially cognitive disabilities, the goal of entry–level employment may be sufficient in some cases. In addition, seeking employment for people with disabilities that will be self–sustaining, but not necessarily family–sustaining, is an important goal, and the emphasis throughout this plan on HPOs and family–sustaining wages makes the goal of competitive, integrated, potentially self–sustaining employment seem less important in the prioritization for this Plan. We would not want funds through this Plan for people with disabilities to be lessened because it might be less likely that they will lead to HPOs and family–sustaining wages. See, e.g., p. 15. Moreover, in the description of priority of categories for people with disabilities, the priority of categories to receive vocational rehabilitation services is ordered by severity of disability. See pp. 135–37. That the most funds will go to those with the most significant disabilities makes it much less likely that those funds will lead to HPOs and family–sustaining wages. Again, the Plan's focus on HPOs and family–sustaining wages as the priority could lead to fewer funds being distributed to the types of jobs that are likely to be appropriate for those with disabilities who are likely to be served under this Plan. See Section IV,

Vocational Rehabilitation Programs, State Goals and Priorities, Goal 1–3, pp. 135–36. Indeed, the state of Washington eliminated the use of priority of service and were able to eliminate a wait list of 14,000 people as a result. Additionally, we suggest another consideration for the approach in the prioritization of those with disabilities who will be served under this Plan: a “Jackie Robinson” approach. As the first African–American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. Instead of focusing all the dollars in the Office of Vocational Rehabilitation (OVR)’s plan on people with the most significant disabilities who may have the biggest barriers to employment and may have the most difficult time overcoming them, focusing a larger share of dollars on people with less significant disabilities and therefore fewer barriers to employment may be more effective in terms of convincing the general public of the efficacy of competitive, integrated employment for people with disabilities. It also may result, as it did in Washington state, in larger numbers of people with disabilities from across the spectrum to achieve the goal of competitive, integrated employment. Response: We appreciate the comment and note that while HPOs are emphasized, the system ultimately must provide services that best meet the needs of the individual customer. Regarding order of selection, OVR will maintain its current Order of Selection of serving eligible individuals with most significant disability (MSD). Throughout the year OVR senior management will evaluate and monitor the agency’s available resources on a regular basis to justify the priority category within the order. Per federal regulations, OVR currently tracks and re–contacts individuals who are found ineligible for OVR services. • Monitor Youth with Disabilities by Disability to Better Analyze How to Increase Their Employment Rates: A significant gap in the Plan data is that it fails to breakdown employment for people with disabilities by the type of disability they have. See, e.g., Section I, Economic Analysis; Section IV, Vocational Rehabilitiation Programs, State’s Strategies, pp. 22–23; 145–57. Placing all people with disabilities into the same category to find methods of increasing employment for them will be ineffective. The tables below show examples of how diverse the population of people with disabilities in Pennsylvania is, and the differing impact their disabilities have on their employment potential: So, for instance, while 4.9% of people from the ages of 16–20 have a cognitive disability, by far the most common type of disability among that age group, as they get older, only 22.7% of those between ages 21–64 with a cognitive disability are employed. Therefore, it makes sense to focus efforts in determining how to increase employment among those with the most prevalent type of disability. Early training efforts, such as those mentioned in the plan throughout (see, e.g., pp. 15, 108–9, 115, 136–38), will yield the most results if they are tailored to address the issues for most of those with disabilities. In fact, Maryland’s WIOA Plan analyzes by region the correlation between people with disabilities and those who had Individualized Education Plans (IEPs). Regionally, the data showed that areas with a strong IEP system and more people who had IEPs in school, later had less dependence on entitlement benefits. In other words, early and strong education and vocational training will result in adults with disabilities who will be able to be more productive members of our community. Our Plan should include data that analyzes this correlation and seeks to ensure that the Department of Education is well–equipped to provide successful training. See Section II, Operational Planning Elements, Engagement with Educational Institutions and Leveraging Resources to Increase Educational Access, pp. 49–51; Section IV, Program Specific Requirements, Vocational Rehabilitation Programs, Coordination with Education Officials, pp. 116–9. Response: OVR/PDE/DHS continue to explore options to align data management systems to provide for better analysis of outcomes and the services that promote, or conversely, limit them. The agency partners have been challenged by differing federal reporting requirements, existing "legacy" systems and limited resources; however, we agree that more consistent, accurate data collection and more thorough analysis of that data is necessary to continually assess the services that we provide and the outcomes they generate for individuals with disabilities. • Ensure the best data points, including Labor Force Participation Rates of people with disabilities, are used as performance metrics: It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking solely at

unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Pennsylvanians with disabilities. This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work. As mentioned in the opening section of our comments, one of these data points was included in the Combined State Plan. Specifically, the section providing "a summary of Pennsylvania's labor force for 2014 including data for veterans and persons with disabilities," includes the labor force participation rates. It is critical to ensure that these numbers are included in both the state dashboard and elsewhere in the WIOA Combined State Plan. As stated in the opening sections of our comments, it is also critical to look at the employment gap between Pennsylvanians with and without disabilities. This is a critical metric and it is needed to ensure that barriers to employment are being overcome and positive outcomes are being achieved. Response: We appreciate the recommendation to include analysis of individuals with disabilities to include labor force participation rates of people with disabilities on the state dashboard and in performance metrics and we plan to do so. We agree that it is important to evaluate the effectiveness of the state's WIOA plan in achieving all stated goals, including increased employment opportunities for individuals with a disability. • Addressing Transportation Issues Is Critical to Improving Employment Outcomes: The Plan recognizes how critical access to transportation is for improving employment outcomes for Pennsylvanians with barriers to employment. See, e.g., pp. 37, 103, 121, 146–47. But we cannot emphasize enough that employment outcomes for people with disabilities will not improve unless transportation access is improved. Paratransit is limited in its scope, the ability to drive or access to a car is limited for many people with disabilities, and walking safely or at a have reliable transportation for work. The Plan must set out a commitment to work with the Department of Transportation and the employers with whom they engage to determine innovative ways to help Pennsylvanians with disabilities have reliable transportation for work. In some case that might be mass transit or Paratransit. In other cases it might be new models with companies such as UBER. Indeed, UBER is also a potential form of self–employment for people with disabilities. Response: We appreciate the comment and agree how critical access to transportation is for improving employment outcomes for people with barriers to employment, specifically for individuals with disabilities. We will work with PennDOT to address this challenge. • Focus on Effective and Strategic Employer Engagements, Especially with Federal Contractors Around Section 503: More emphasis is needed in the Plan around the employment opportunities and talent challenges created by the Section 503 regulations of the 1973 Rehabilitation Act and federal contractors. These regulations are only referred to in Section IV, Vocational Rehabilitation Programs, Evaluation and Reports of Progress: OVR and Supported Employment Goals (pp. 151, 155). We are pleased that Pennsylvania has already started to recognize the unprecedented opportunities surrounding the goal for federal contractors to have 7% of their workforce across each segment to be people with disabilities. However, the Plan ought to address exactly which contractors will be targeted for training and other supports to help them reach this goal. In Pennsylvania, for example, the chart below shows employers who are the top federal contractors falling into the purview of the § 503 regulations: Section I, Goal 4 (p. 15); Section IV, Vocational Rehabilitation Programs, Coordination with Employers (p. 120), Section IV, Vocational Rehabilitation Programs, State's Strategies, p. 140, and Appendix XIV are only a few places where focus should be spent on leveraging the § 503 mandates to achieve our goals. Response: In the past under 1973 Rehab Act Section 501 and Section 503 Affirmative Action requirements, and currently under the new Section 503 Individuals with Disability (IWD) Workforce Inclusion Rule, OVR has worked closely with the Philadelphia and Pittsburgh PA Regional U.S. Dept. of Labor (DOL) Office of Federal Contract Compliance (OFCCP) Administrators and staff in outreach encounters with new or existing Federal Contractors to insure their full compliance in the recruitment, hiring and retention of qualified individuals with a disability (IWD). The U.S. DOL OFCCP has provided direct referral of businesses to OVR since 2014 that are improving

their compliance and outreach of qualified IWD and by providing Internet access of current Pennsylvania federal contractors who must comply with the Section 503 Rule for a goal of 7% IWD workforce participation in their business. We will also work with the Department of General Services and other state agencies, as relevant, to address this concern. • Do Not Leave People with Disabilities Out of STEM Goals: The Plan acknowledges that one of the largest growth sectors in Pennsylvania is Healthcare See Section I, Economic Analysis, pp. 25, 27. More on that later as this is a key sector. Furthermore, goals of the plan in Section I, Goal 3, acknowledges in paragraph 3.9 that STEM training for out of school youth will be an effective way to increase employment outcomes under the Plan. However, people with disabilities are not discussed as being the target of STEM goals. Given that many federal contractors as well as healthcare employers will need STEM trained employees, it is clear that many opportunities will exist for people with disabilities in these fields. Not targeting people with disabilities for STEM training opportunities will make them miss out on a large employment opportunity in Pennsylvania. Partnerships should be created with federal contractors who have 503 requirements and talent shortages. The companies in the above table, as well as Lockheed Martin Corporation, and hospitals throughout the Commonwealth, will be prime candidates for these efforts. Through WIOA, Pennsylvania's workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements. At JCHAI, for example, we have begun a training program in building robots for those with intellectual disabilities and autism in our program in conjunction with the FIRST Robotics Competition and Lockheed Martin. Our first class taught rudimentary building skills as well as basic programming to our students. These skills are important to getting jobs in today's economy. People with disabilities should receive the same trainings as others in these fields. Response: We appreciate the comment. Goal 3.9 is not intended to suggest that persons with disabilities will not be afforded STEM opportunities; it was merely an example of how state resources were being utilized in support of another WIOA target population (out–of–school youth). We applaud the commenter for their work in developing a training program in building robotics for those with intellectual disabilities and autism. • Focus on Sector Strategies to Get More People with Disabilities Employed: The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding. Section I, Economic Analysis (p. 20 et seq.) contains a detailed analysis of Pennsylvania's economy. The Plan states that "[g]rowth will be greatest in the Construction, Professional & Business Services, and Education & Health Services sectors." See p. 24. Pennsylvania should (and does: see p. 15) place front and center proven training programs such as Project Search when helping those with disabilities get the training they need to be employed. Project Search has many sites in Pennsylvania that are primarily based in healthcare settings: one of the biggest areas of projected growth in Pennsylvania. JCHAI has successfully partnered with Project Search at its Lankenau site in Wynnewood to train several of our clients in employment skills that have resulted in their being employed long–term. We intend to continue this partnership and with more funding to Project Search, they would be able to expand their offerings into other growth industries in Pennsylvania. The ARC of Pennsylvania has worked effectively with SAP and Specialisterne to pilot projects to promote the hiring of people with autism in technology fields. This program is a groundbreaking program that used human resource training, mentoring, and the hiring of small cohorts to promote the larger goal in ways that are being replicated throughout the country. See, e.g., http://www.forbes.com/sites/robertszczerba/2016/01/19/this–visionary–may–completely–disrupt–the–tech–industry–as–we–know–it/550e9200890e. The program in the last year has been expanded to Towers Watson in Philadelphia as part of the Philadelphia Pilot Project. http://www.paautism.org/phillyautismproject/Resources/Resource–Details/itemid/6103 Examples of these partnerships should be included in the Plan as well. See Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120–21. As has been documented in many cases, there can be an "Autism Advantage" in the STEM space. Indeed, some people on the autism spectrum can have the very best skills in science, math and engineering. Microsoft, SAP, and

Specialisterne have committed themselves to “provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.” The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit. Delaware’s Governor Jack Markell is partnering with companies to employ more people on the autism spectrum in STEM jobs. Such examples need to be implemented by Pennsylvania as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become scientists, engineers, doctors and mathematicians. Response: We appreciate the comment in support of replication of the model. • Effective Employer Engagement Includes Involvement by the PABLN: Our hope to see improving employment outcomes in Pennsylvania very much depends on being an employer–driven paradigm shift. Fundamentally, this law is about spurring innovation and expanding opportunity. There will be no outcomes in terms of employment for Pennsylvanians with disabilities without early, often, systematic, and aggressive business engagement. Clearly, the Plan recognizes the importance of employer engagement. Throughout the Plan, sections reference the importance of employer involvement in developing pipelines of jobs. See, e.g., Section II, Coordination, Alignment and Provision of Services to Employers, pp. 49–50; Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120–21. Disturbingly, however, there are no references to one of the great resources in Pennsylvania, the Pennsylvania Business Leadership Network. In response to the business community’s needs for a diverse set of qualified workers to fill its labor needs, meet its compliance requirements, and respond effectively to the needs of its diverse customers, AHEDD began coordinating a statewide business initiative, The Pennsylvania Business Leadership Network (PA BLN) in 2000. The PA BLN is part of a national initiative that began in 1994 and that includes approximately 50 BLN affiliates throughout the country. The national effort is now led by the USBLN (http://usbln.org), which has the support of a number of corporate partners. The PA BLN has piloted groundbreaking partnerships with Pennsylvania businesses, including Hershey Resorts and Highmark, Inc. Pennsylvania must utilize the depth of experience and knowledge that PA BLN has in onboarding Pennsylvania employers to the benefits and ease of increasing their disability diversity hiring practices. Response: We accept the comment and will make a change to page 139 to include mention of the Pennsylvania Business Leadership Network. • Busting Stigmas, Myths, and Misconceptions should be a key part of Pennsylvania’s overall workforce strategy: Low expectations and misconceptions are critical barriers to employment for people with disabilities. A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent. Similarly, a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees. We therefore recommend that the Pennsylvania’s Combined State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas. Indeed, we know that other groups of Pennsylvanians with barriers to work also face stigmas, especially those leaving the corrections system. See, e.g., Section IV, Vocational Rehabilitation, State’s Strategies, Goal 1: Increase Employment Opportunities for People with Disabilities, pp. 145–46 (could be added as 4 step for Goal 1). The PA BLN has proven experience in successfully handling exactly these types of sensitive matters. They should be specifically referenced as a partner in achieving employment goals for Pennsylvanians with disabilities (pp. 120–21), even if utilizing them may not be in furtherance of the Single Point of Contact approach (p. 140). We are a large Commonwealth, with diverse employers and regions, and the Single Point of Contact approach may need to be modified to reach effectively the varied types of locations of employers in Pennsylvania. While the approach needs to be adaptive, previous research and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three: o CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should

focus on putting people with disabilities into their talent pipelines. This is best done through business–to–business success stories. Hershey, Jefferson Hospital http://articles.philly.com/2014–11–29/news/56543664_1_speech–language–pathologist–disability–bosses), Giant Eagle, and other Pennsylvania employers have seen that people with disabilities can be extremely capable and loyal workers. While there are few like Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done. o Human resources professionals and on–the–ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty. Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they do not know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Pennsylvania's OVR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in–person training is readily available to help from a variety of sources. RespectAbility has online webinars, as does ASKJAN.org, USDOL and others. Partners like the Poses Family Foundation Workplace Initiative can provide training to the workforce staff and volunteers systems–wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. The National Organization on Disability and the interested leadership of Former Governor Tom Ridge offer incredible resources and a powerful voice. o People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have Pennsylvania's "Employment First" Policy supported by a PR campaign that will inspire Pennsylvanians with disabilities to reach for the stars. For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are dyslexic. Scientist Stephen Hawking and multi–billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co–founder of the giant EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward. Response: We agree and will make mention of PA BLN has a key partner on page 139 of the State Plan. We also appreciate the comments suggesting groups to focus communications campaigns on. • Ensure That All Programming Is Fully Accessible: In several places throughout the Plan, various web–based outreach services are described as well as One–Stop Centers. See, e.g., Section III, Assessment of Programs and One–Stop Partners, pp. 57–59, Non–Discrimination and Accessibility, pp. 70–71, Section IV, Vocational Rehabilitation Programs, State's Strategies, Goal 3: Increase community education and outreach, pp. 148–49. While physical accessibility is important and all physical locations should be fully accessible, ensuring that the workforce system is programmatically accessible will have a broader impact. As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are critical topics in need of close attention. There are signs that the collaboration needed to support assistive technology already exist. For example, on page 46, discuss how OVR in Pennsylvania collaborates with BWPO via PA CareerLink® centers to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment." Further, page 71 of the Plan commits to a collaboration with the independent living movement to "evaluate the physical accessibility and information technology accessibility of all PA CareerLink® offices and services." To do this well, it will be vital to be proactive, thoughtful, and use such a review as a chance to think about accessibility more deeply.

Response: We appreciate the comment and note that the commonwealth mandates that all the PA CareerLink® centers provide reasonable accommodations, including programmatic accessibility. We will look for ways to continue to improve programmatic accessibility as suggested. • The Plan Appears to Target Efforts for People with Disabilities Solely Through OVR, Without Considering that Those with Disabilities Fall into Almost Every Other Group Addressed in the Plan.: The Plan addresses boosting employment for what it appears to consider as distinct groups: Section I, Goal 3 seeks to "Increase Work–Based Learning Opportunities for Youth." See pp. 12–15. Although initiative 3.12 specifically addresses youth with disabilities, all the initiatives named in this section could be used for people with disabilities. This same segregation of people with disabilities out of categories that apply to them as well occurs in considering programs for veterans, corrections education, and adult education. See pp. 67, 103, 229. Recognizing that goals may be achieved for people with disabilities across many programs will be essential to increasing employment opportunities for more people with disabilities. Response: We appreciate the comment and note that all programs serve individuals with disabilities assuming they otherwise meet program eligibility requirements. • Facilitate Innovation in Vocational Services by Not Limiting Them to OVR Agencies or Particular Kinds of Credentialing: The primary focus of the programs for people with disabilities under the Plan is through the Office of Vocational Rehabilitation. Section IV, Vocational Rehabilitation Programs (pp. 108–157). Although clearly the OVR has a great deal of experience in assisting Pennsylvanians with disabilities in finding and maintaining employment, other parts of the state government as well as other service providers have experience doing so. See, e.g., pp. 119, 120. To limit the development of innovative programming to change the employment landscape for people with disabilities to agencies that are already OVR contractors would be short–sighted. Many providers work through the Department of Human Services to provide complementary services for people with disabilities and as a result, have experience in developing programming for gaining competitive, integrated employment for people with disabilities. Indeed, because the concept of Employment First is new in Pennsylvania, it may be that providers who are not already OVR contractors could have more ability to help increase competitive, integrated employment opportunities for Pennsylvanians with disabilities. Having onerous certification procedures could also be barriers to newer agencies becoming involved in our reaching our employment goals for Pennsylvania. For example, at JCHAI, we have a 70% competitive, integrated employment rate for those of our clients who are interested in employment. We have been able to attain this rate because our staff uses varied approaches to helping our clients find and maintain their employment. However, our agency is not a contractor with OVR, but with the Office of Developmental Programs (ODP). Working hand in hand with other governmental agencies and private providers with relevant experience will help improve the chances of achieving higher rates of employment for Pennsylvanians with disabilities, while still ensuring quality provider involvement. Furthermore, OVR's focus on particular credentials for those working to improve employment outcomes could be limiting and not necessarily promoting the most current techniques in vocational rehabilitation. The OVR Counselors, for example, must have a Master's Degree in Rehabilitation Counseling, Rehabilitation Administration, or Rehabilitation Education; or Certified Rehabilitation Counselor credentialing. See p. 126–27. There are other forms of training, including Discovery and Customized Employment trainings, that would be more current to promote Employment First principles, and do not necessarily require the credentials called for in the Plan. Again, flexibility is key to promoting the innovation that is the hallmark of WIOA. Response: PDE will collaborate with OVR to develop a training strategy to help IEP teams in school districts incorporate Employment First principles into work, education and transition plans for youth with disabilities.

• Finding Market Niches with High Turnover Jobs: Millions of dollars are lost each year due to employee turnover. For all jobs earning less than $50,000 per year, the average cost of replacing one employee is between $6,000 and $20,000. Research shows that employees with disabilities are more productive and loyal than their non–disabled peers. Company records show that even when

the relatively more expensive accommodations were factored in, the overall costs of accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. Hospitals, elder care institutions, hotels, and distribution/supply chains including UPS, Walmart, and Walgreens have proven records of success. They can be outstanding partners for disability employment as these industries suffer from high turnover rates and employees with disabilities are proven to have significantly higher retention rates It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. o Health and Elder Care – Challenges and Opportunities for People with disabilities Page 20 of Pennsylvania's Combined State Plan, provides an overview of "Current State of the Pennsylvania Labor Market." This section discusses in detail the challenge created by an aging population. "Simply stated, Pennsylvania's population is growing older. The number of Pennsylvanians age 65 and over was 2.1 million in 2014. The state's percentage of those aged 65 and over is the sixth highest in the nation (16.7 percent)." This fact of an aging population creates both a challenge and an opportunity for Pennsylvania. As Baby Boomers age, the demand for healthcare will grow and with it, the talent needs of assisted living and elder care facilities. Training and preparing workers to meet those needs is a challenge, but one with a ready solution. We submit that people with disabilities are a natural labor resource that can be trained and prepared to meet this need. There are numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elderly care, and in assisted living. This is where the opportunity a serious, sustained expansion of Project SEARCH and other school to work transition programs can be beneficial to Pennsylvania's economy and population. This is a natural opportunity that demands quick action and an investment in cost–effective programs. Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, the first longitudinal study of the program found "a 68% success rate in transitioning students from high school into competitive employment" and "Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall." The goal for each program participant is competitive employment. o Logistics and Distribution Centers – Natural fit for people with differences. Another sector with high turnover and big potential are distribution/supply chains. Many companies, including UPS, Wal–Mart, and OfficeMax have proven records of success. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities. These efforts have taken the logistics sector by storm with Lowe's, OfficeMax, Pepsi, as well as P&G all launching their own successful disability hiring initiatives. For example, as reported by the National Organization on Disability, "Lowe's hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18–month period." They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. Another great example is Starbucks. Their "Inclusion Academy" has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant. o Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities Registered apprenticeships, on–the–job training, and other training programs are critical examples of how to create a demand–drive talent pipeline through the workforce system. It is vital that such training programs be fully accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to "youth and young adults with a full range of disabilities." The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents. We encourage you to invest time and energy to understand the best practices contained in ODEP's apprenticeship toolkit. Partnerships for apprenticeships and internship should be created with federal contractors who have

503 requirements and talent shortages. Pennsylvania should identify federal contractors with Section 503 requirements and have talent acquisition needs for partnership opportunities that can be win–win–win for employers, people with disabilities and taxpayers alike. Placing programs like the highly successful Project SEARCH program at Federal contractors can be worthwhile for non–STEM jobs as well. o Hospitality and Hotels – An Great Opportunity for Expanding Project Search Employers working in this sector can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities. An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers have launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses' Workplace Initiative could easily be part of the overall Sector Strategies for California. Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Pennsylvania to improve employment outcomes for people with disabilities. Response: PDE will work with OVR to explore the Project Search model, models like it and other such market niches as opportunities for integrated employment for youth with disabilities. • Conclusion: The undersigned organizations thank the taskforce that produced this Workforce Innovation and Opportunity Act Combined Plan for Pennsylvania. It starts a great roadmap to improving employment for all those who experiences barrier to productive employment. People with disabilities have been excluded from true employment opportunities for too long. But the bottom line is that expanding job opportunities for people with disabilities is win–win–win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seekers with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides. Response: We appreciate the comments in support of the plan and agree with the sentiments expressed by the commenter. Juniata College offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system encompasses much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, and also the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area's federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response dollars in support of retraining and each year a portion of these funds go unspent. Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront and face of and for the delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Furthermore, considerable

portions of our region are not serviced by high speed internet. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. As a partner in the public workforce development system, we understand our role as stewards of the public workforce dollars; we are also committed to ensuring that our residents have access to vital services. Thank you for the opportunity to provide these comments and we hope they will be given due consideration. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Carmen Rosa Kahiu, Kahiu Shelter Investments, commented: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink(R) centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Kencrest EmployNet submitted the following comments: • Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan includes the state's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self– sufficiency. These goals support engaging individuals with barriers to employment in opportunities and supports to enable them to attain a job that pays. This includes goals to Establish Career Pathways, Invest in Strategic Partnerships with Employees and Educational Institutions, Increase Work– Based Learning Opportunities for Youth, Engage employers to strengthen the Connection of Education and training

and the economy, and strengthen data sharing. As a provider of services to individuals with intellectual disabilities it was encouraging to note the inclusion of goal 2.10 “Employment First” in Section I, Strategic Vision for Workforce Development in the Commonwealth Of PA. Furthermore the idea that Pennsylvania could become “a model state when it comes to creating a climate hospitable to workers with disabilities” is very encouraging. However this commitment is not reflected in the execution of the plan in a number of ways including: o Alignment with Other Partners Programs (page 42) the proposed MOU Memorandums of Understanding will be supported by limited funds and based on availability of funds and assessment of available resources on a year to year basis. o Strategic Vision for Workforce Development in the Commonwealth of PA, under five broad goals on page 8 there is reference to an “emphasis on Pennsylvanians with barriers to employment an opportunity to obtain a job that pays.” It is not clear if this plan also places an emphasis on the placement of individuals into competitive integrated employment, and the use of fully integrated settings for assessment and career exploration activities (including during transition), and avoidance of settings that segregate and reinforce stigma. Response: We appreciate the comment in support of Employment First and assure the commenter that the commonwealth is committed to that goal. An Executive Order was issued by the Governor on March 10, 2016. The commonwealth will seek additional funding, including federal and foundation funding, to support the achievement of the WIOA state plan’s goals. • It was also noted in Section I, Strategic Vision for Workforce Development in the Commonwealth Of PA that the Governor believes this plan, “is the starting point for an unprecedented effort in Pennsylvania to transcend fragmentation”, “Overcoming silos and promoting program integration.” (page8) An expansive and integrated approach is greatly needed to provide individuals with intellectual disabilities with the resources they require to be fully integrated in Pennsylvania’s workforce. Unfortunately this plan does not create an expansive plan for supporting individuals with intellectual disabilities, nor does it address the fractured and antiquated nature of the supported employment service system in Pennsylvania. o In reading this plan it was promising to learn of the expansive and detailed plans in place to support both our Veterans (p. 199) and our Senior population (p. 204) in Pennsylvania. Both of these communities are in great need of expert and dedicated supports to assist them in accessing the workforce and are deserving of every resource at their disposal. However, we are disappointed to find no such plan in place for individuals who experience intellectual disabilities. o Instead this plan relies almost solely on the Office of Vocational Rehabilitation and makes little effort to address other resources or avenues for funding or supports. This point is well reflected in the chart found on page 45. The Office of Developmental Programs is not listed as a partner organization under the Department of Human Services. o The role and responsibilities of the Office of Vocational Rehabilitation (OVR) are well defined (p. 108). However, the heavy reliance on OVR creates one large silo, one which is likely to create stagnated services and will not address the varied needs of the intellectual disability community. Evidence of this can also be found in the lack of a plan for people denied by OVR for employment supports. o Lastly this plan does not address the independent policies of Administrative Entities which are found to differ; county to county and entity to entity. Without efforts to close loopholes and provide consistent policy statewide, individuals with intellectual disabilities will not be successfully included in our workforce. o It would be preferable to find a well thought out strategy, fully inclusive of OVR, ODP, Administrative Entities and Providers included in this Combined State Plan. Response: We appreciate the comment. OVR has entered into a "Memorandum of Understanding" with the Office of Developmental Programs to which specific funding is attached. Additional VR staff who are dedicated to serving individuals with ID and Autism will be hired. In addition, new service delivery models are being developed and implemented jointly with ODP. Interagency staff training is being developed for implementation in the spring of 2016. Service definitions, provider qualifications, rates and policies are being evaluated to bring them into greater alignment across systems. As the MOU was not effective at the time of the development of the Combined State Plan, it was not clearly outlined. • In reading this plan, it is our belief that it is not reflective of the rehabilitation needs of Pennsylvanians with significant intellectual disability. Once again looking at section 2.10

“Employment First” the definition of which is that competitive integrated employment is the first consideration and preferred outcome of publicly–funded services for all working age Pennsylvanians with a disability. This definition clearly includes all Pennsylvanians not only those with less complex disabilities. Unfortunately, individuals with more significant disabilities have not been adequately included in the WIOA combined state plan as illustrated in the points below o There is no outlined planned for how people with significant intellectual disabilities currently served in segregated programming will transition into competitive supported employment. o The one point of entry through the Office of Vocational Rehabilitation is disrespectful of the needs of those with significant disabilities who will likely be denied services by OVR– as we have learned from being a vendor organization for OVR for the past 25 years. o Collaboration with VR, ODP and the Individual Support Plan process would ensure that individuals with more significant disabilities would receive the needed supports to be successful in the workplace. These supports might include adaptive equipment along with physical and emotional support. o Lastly– although there is a plan in place (p. 128) to “ensure that OVR’s personnel receive significant knowledge from research and other state of the art methodologies…experts in the field of rehabilitation…at in service training programs”, not one speaker or expert listed is from an organization focused on the needs of individuals with intellectual disabilities. We would strongly suggest that OVR staff receive routine training from Pennsylvania Advocacy and Resources for People with Autism and Intellectual Disability (PAR), the Association for People who Support Employment First, and the American Association on Intellectual and Developmental Disability (AAIDD). Response: We appreciate the comment that supports increased collaboration and partnership between OVR and ODP to assist people with significant intellectual disabilities. Keystone Community Education Council offered the following comments: The Community Education Councils funded under the Department of Education play an integral part in the local workforce development system for our service areas. We are Educational Facilitators serving over twenty counties with a population of over one million. The CEC’s are coordinators of a network of public/private programs and must remain institutionally neutral. The CEC’s act as Resource Centers for the area adults and are providers of seamless services using limited staff and infrastructure. Because we play a major workforce development roll in the areas that we serve please give consideration to adding the following to the State Plan. • Page 39–44 Alignment with Other Partner Programs o The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities. • Page 51–53 Leveraging Resources to Increase Educational Access o The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of training programs based on identified need and demand. • Page 53 under the heading Improving Access to Postsecondary Credentials o The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities. Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53. Lehigh Carbon Community College offered the following comments: • How will this plan affect the Perkins Career and Technical Education program? Will educational institutions receiving Perkins funds be required to use part of their Perkins allocation toward WIB services? Will institutions be restricted in how they use their Perkins funds (i.e., specific programs or activities)? Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion

of the Perkins plan is detrimental to the achievement of the Governor’s goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. • Will development of career pathways be a requirement for Perkins funding? Are there specific industry sectors we will need to target for career pathways? Response: Federal Perkins recipients must meet the federal Perkins mandates and required uses of funds. The purpose of Perkins is to improve CTE programs. Each recipient must develop and offer programs of study and if the programs of study align to the career pathways developed under WIOA, then the Perkins recipient should align the program of study with the career pathway. • Will we be required to develop partnerships with WIBs or employers for Perkins funding? Response: Perkins recipients must work with the LWDBs. LWDBs are already a required member of the Participatory Planning Committee. • We at LCCC would like Perkins funds to continue to be allocated directly to the community colleges and recommend that the Commonwealth separate Perkins from the state’s combined WIOA plan. o There are no evident benefits of combining Perkins with the state WIOA plan. o Mixing Perkins into the WIOA plan creates an additional bureaucratic structure, additional paperwork, and another layer of reporting requirements. o Placing Perkins into the WIOA decreases an already shrinking amount of funds available to the colleges providing the direct training. There is already more demand for Perkins services than the existing appropriation can support. o The state’s community colleges have a long history of managing Perkins funds effectively to link education, course alignment and training to workforce needs. To date, we have not been made aware of any issues related to our management of Perkins funds and there is no need to make changes to a system that works effectively. o Community colleges have a strong working relationship with PDE relative to the use of Perkins funds. o By definition, Community Colleges remain committed to strategic employer engagement and will continue to work closely with CareerLink and our technical institutes to leverage access and use of resources. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor’s goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. • It is also important that the state use the Governor’s "set–aside" for business education partnerships with community colleges since we already have an administration and faculty infrastructure in place. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor’s set aside funds. • LCCC has been designated as a veteran friendly campus and we would like to share our knowledge and expertise as a model/best practice for others across the state to follow. Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice. • We recommend that the PA–TIP include more health care occupations due to the fact that these are generally well paid careers in high demand in Pennsylvania. Including more health occupations in PA–TIP would help more students gain education and employment in these industries. Response: PA–TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today’s employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request. • We recommend that "completion of academic credentials" be the performance measure for training providers. We have concerns regarding "employment" as a performance measure. o It is challenging for the College to efficiently track students’ employment once they complete their degree. o Students sometimes have other issues (e.g., cannot pass drug screening, cannot pass

credit checks, have psychological or other trauma making them undesirable candidates for some employers, etc.) that are not related to their education and training and College's should not be held to employment as a means of determining whether or not the academic program is successful. Response: We appreciate your comments and understand your concerns surrounding employment as a performance measure for training providers, but this is a federal requirement the commonwealth is unable to amend. We also appreciate the suggestion of including completion of academic credentials as a measure. The WIOA legislation includes credential rate as a performance outcome and eligible training provider measure. • Regarding the 2nd paragraph on page 21 and our service to rural parts of the state, LCCC would like to express the fact that we have been serving rural populations for over 50 years. We even have a foundation scholarship that provides for free full Associate Degrees for a select group of students. Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to its residents. The Philadelphia Office of the Local Initiatives Support Corporation offered the following comments: On behalf of the Philadelphia office of the Local Initiatives Support Corporation (LISC Philadelphia), we thank the Department of Labor and Industry for the opportunity to make comments on the Commonwealth of Pennsylvania's Combined State Plan for the Workforce Innovation and Opportunity Act (WIOA). We are pleased to see a focus on career pathways for adults and youth throughout the plan and have additional suggestions for ensuring that workforce development services help jobseekers achieve financial capability. LISC Philadelphia is a local office of a national non–profit community development organization dedicated to strengthening neighborhoods and improving lives of residents. LISC Philadelphia combines corporate, government and philanthropic resources to help community–based organizations transform disadvantaged neighborhoods into healthy, sustainable ones— good places to live, do business, work and raise families. As part of its local work, LISC Philadelphia plays the role of facilitator of economic and community–based activities in three targeted sections of the city. This targeted work includes support of four Financial Opportunity Centers™ (FOCs), which are integrated service centers that combine workforce development, financial education and benefits access. Our strategic focus has broadened to incorporate Workforce Development into the core of our place–based economic opportunity strategies. This allows us to facilitate a direct linkage between our anchor institutions, community partners, local employers, and participants in our industry sector partnerships with jobseekers within our targeted communities. While LISC Philadelphia believes the Combined State Plan serves as a solid basis for progress and growth, particularly regarding integrated services delivery, industry partnerships, and an expanded emphasis on youth, following are our brief comments for your consideration: • Training Should Be Driven By Local Demand: Pennsylvania is an economically diverse state, featuring areas rich in agriculture, industry, and service industries. The Philadelphia region has a combination of all facets of Pennsylvania's economy, making that it a unique economic engine for the Commonwealth. It is important the WIOA plan include provisions for allocation of funds for training and workforce development based on local and regional economic data that defines and projects specific areas of economic and corresponding occupational growth. The Local Workforce Development Board and its collaborative partners should be given a measure of flexibility in the allocation of workforce investments based on local and immediate employer demands and emergent opportunities. Response: We appreciate the comments in support of a focus on career pathways for adults and youth. Regarding training targets, we have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Extension of wrap–around services: In support of apprenticeship programs that serve as access nodes to current and emerging career pathways, provisions should be made for wrap–around services. Examples of these services include aptitude assessment, career exploration, transportation and childcare assistance, financial services, and

remedial job training activities. Response: We agree with the commenter and note that these additional services are generally available to workforce customers who meet eligibility requirements. • Broaden Training Opportunities: All of the target populations listed in the plan face complicated barriers and would benefit from tailored training opportunities that address obstacles specific to their location as opposed to an identified statewide need. We recommend that the Local Workforce Development Board's contracted integrated services centers be encouraged to partner with agencies such as LISC that focus on place–based services that target portions of Philadelphia that exhibit both the greatest needs for resources and very specific sources of economic opportunity. For example, the Promise Zone, which includes University City and portions of West Philadelphia, is experiencing significant growth in Construction, Information Technology, and Health Sciences; it should have access to workforce resources focused within these sectors. The integrated services center in West Philadelphia can serve as a conduit for this localized and specific approach, as well as serving as a model that can be replicated in the city's HUD CHOICE neighborhoods and elsewhere. This would assure participants reflect the demographic makeup of the neighborhood served by the centers and derive the most direct benefit of the localized economic growth. This would also make great progress toward the WIOA's priority–of–service goal of reaching 'harder to serve' individuals. Additionally, Industry Partnerships, a proven and successful model, should incorporate training funds for job entrants in emerging sectors. Response: We appreciate the comment and agree that local WDBs should make decisions regarding sectors to target in their respective areas. Luzerne County Community College submitted the following comments: • Luzerne County Community College recommends that the Commonwealth separate Perkins from the state's combined WIOA plan. We are unclear what the benefit is of combining Perkins with the state WIOA plan. Including Perkins with the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers. There is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to bureaucratic overhead reduces the amount of funding directed toward students and clients of the workforce system. The current structure is effective and efficient. Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete. Community colleges have a strong working relationship with PDE relative to the use of Perkins funds so there would seemingly be nothing gained by incorporating what is an academic and career development educational support structure into the WIOA Legislation. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. • We recommend that the Commonwealth consider leveraging the experience and expertise of the community colleges in the workforce system, rather than concentrating funds in, and requiring decision–making to be run through, the WIBs and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. The Community Colleges also have good working relationships with employers in the local community. We work with Advisory Employer Groups in our various Credit and Non–Credit Career Programs, regularly participate on regional workforce and economic intermediary groups, and work with individual employers in a variety of activities that help support skills development and academic training for the emerging, incumbent, and transitioning workforce. Response: Community colleges are an important

partner in the workforce system. The community colleges do have very good relationships with employers in the local communities that they serve. However, there are large areas of the commonwealth where the community colleges do not have those strong relationships. As such, the commonwealth disagrees that the community colleges can take the place of the LWDBs and PA CareerLink® centers. • We recommend that community colleges be represented on the Workforce Investment Boards, Board Subcommittees (p. 57) and on the Youth Councils when they share geography. (First paragraph on page 13 and Item 3.3 on page 14). Community Colleges have extensive experience in serving youth aged 18–24 and would add value to the WIB's and their Subcommittees. Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce development board membership is determined by local elected officials. • We recommend that the state use the Governor's set–aside for business education partnerships with community colleges. The Community Colleges are often represented on BEP's, but Community Colleges could serve as the conveners for these partnerships due to their sustained ties to the employer community. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds. • We think it is important to stress that hours in KEYS counts toward the TANF monthly work requirement set forth by the County Assistance Offices. Many potential students are told by CAO's in order to be eligible for KEYS they must apply for jobs. If the candidate then finds a job, their TANF usually closes then making them ineligible for TANF (cash assistance) and therefore ineligible for KEYS. We think it is important to also stress time in the classroom and studying done at home and on campus meets the work requirement. Also, time in KEYS in unlimited. There is a misconception that once referred a student can only be in the program for 2 years. The KEYS Program is currently allowed to use 24 months of voc–ed time, but time can be saved by participating in other allowable activities. DHS is also allowing for 6 month extensions once 24 months has been used if the student meets certain criteria. One of that criteria is that the student is enrolled in a degree that will lead to a high priority occupation. Although SNAP recipients are eligible for the program, the number is limited based on current guidelines. This program is only promoted by a few select staff members at the CAO's. If the Community Colleges had more input/control over the referral of potential KEYS recipients, it might help connect students to services more efficiently as serving students is part of our core mission. Response: As a condition of eligibility for cash assistance, applicants over 18 years of age who are not employed a minimum of 20 hours per week are required to apply for at least three jobs per week while their application is pending. However, a student or prospective student may meet their Work Participation Rate while enrolled in KEYS through any of the core activities allowable, including Vocational Education, as long as they adhere to the time limits for each activity. The participant's activities are determined by the participant and KEYS provider once the referral is made. DHS agrees that there is a misconception that KEYS is a time limited program. KEYS is not a time limited program although certain activities, such as Vocational Education, have time limits. We believe this misconception will be avoided in the future through the implementation of the KEYS Vocational Education Exception Policy, OPS Memo 15–09–03. The KEYS budget is 80% TANF funded and 20% SNAP funded. In order to ensure the proper appropriation of staff time and services, SNAP enrollment per KEYS program cannot exceed 20% of their total enrollment. DHS is currently reviewing that split. CAOs are responsible for determining appropriate referrals to an Employment and Training program. They are instructed, per OPS 14–06–01, to refer any client that is enrolled in or expresses an interest in enrolling in one of the community colleges to the KEYS program. • Luzerne County Community College advocates for the addition of CIP 51 to cover more health care occupations as follows, "Health care occupations are significant to the current and future workforce growth and economic viability of the Commonwealth. Expanding the eligible PA–TIP programs to include the health care industries would provide much–needed financial assistance to students seeking to be employed in these critical occupations." Response: PA–TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's

employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request. • Data reporting requirements pursuant to WDQI are burdensome on Community Colleges as the number of WIOA–funded participants is usually less than 1% of the total student population, but we are required to report on all students within CareerLink state–approved programs. Similarly, Community Colleges and all training providers are held accountable for performance measures of all students, not just the WIOA–funded students. This places additional burden on the staff responsible for collecting and reporting on the data/performance. Response: Collection of performance data for all eligible training providers is a federal requirement for which the commonwealth is unable to provide a waiver. The commonwealth is committed to identifying ways we can meet the federal requirement and ensure workforce program participants have access to a robust list of training opportunities. • The State plan continues to rely on L&I's HPO list. While the list is valuable to guide curriculum development and continued investment in programming and training that supports HPO's in the region, the fact that the list changes every year makes planning in 2–3 yr. cycles more difficult. We would offer that new programs be added every year as appropriate, but that there be some sort of provision for sustainability of programs over a 2–3 yr. cycle before removal to allow for more suitable planning and investment. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Luzerne County Community College serves rural counties (2nd paragraph on page 21) through both off–campus site access and on–line coursework. The College is pursuing additional program completion options in Centers beyond the main campus in Nanticoke. There are program completion options at Northumberland Regional Center, Hazleton, and Berwick Centers currently and additional sites are being considered at this time. These Centers serve a more rural population in addition to the populations right in the city/town in which they are located. Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to its residents. Luzerne/Schuylkill Workforce Investment Board, Inc. offered the following comments: The Luzerne/Schuylkill Workforce Board (LS WDB) supports many of the Governor's goals and objectives as identified in the proposed state plan. We agree that each local area and region plans to exert its utmost efforts in meeting/exceeding the Governor's agenda as described in the proposed state plan. With this underlying understanding, the LS WDB respectfully submits the following comments with reference to the Governor's goals/objectives as set forth in the plan. We are requesting consideration of incorporating flexibility allowed and encouraged by WIOA into the plan that will permit local areas and regions to be responsive to the differing needs of their job seeker and employer customers. • Training Benchmarks (WIOA Plan 2.1, p. 10) and Priority of Service (WIOA Plan p. 67): training expenditure goals: o Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent, but it is not clear in the language of the plan. o Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA–funded program. We believe this to be the intent, but it is not clear in the language of the plan. o Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out–of–school youth minimum expenditure requirements are calculated. o Include all allowable training activities under WIOA section 134 as well as, National Emergency Grants and other similar Federal Grants, Industry Partnership Grants, work experience and internships in calculating training expenditures. o Include PELL, scholarships and other forms of financial aid to offset the Title I training target. o Include training conducted under other federal funding, including but not limited to American Apprenticeship,

H1–B, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target. o Include one–stop partner program training expenditures for participants dual enrolled in the one–stop partner program and WIOA (e.g. Trade Act). We believe this to be the intent, but a statement to that effect would make the section clearer. o Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. o Include the cost of registration, books, lab fees and required uniforms. • It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below: o Exclude dislocated workers from the calculation as their eligibility is not based upon barriers. o Include the local board definition of not earning a “self–sufficient” wage as one of the barriers. It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary qualifications, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or a stabilizing social service assistance. PA CareerLink® staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed. Response: We appreciate the comment in support of many of the Governor’s goals and objectives and the local area’s plans to meet and exceed those goals. The State Plan seeks to balance local control and flexibility while assuring the governor’s priorities are achieved. In regard to training benchmarks, we have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We have also made clear that administrative funds will not be included when calculating training targets. • Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”: o Exclude dislocated workers as their eligibility is not based upon barriers. o Include those individuals who fit in the local board definition of not earning a “self–sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service. o Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons. o It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers. Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis. • Performance Measures: Pennsylvania’s 23 local areas are anxious to deliver and exceed the performance baselines that will be negotiated by the state and which are contained in the draft plan. Because states and local areas are still transitioning to WIOA, and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following: o The parameters for the calculation of the measures have not yet been issued by the U.S. Department of Labor and will not be issued until after the state plan is due. o There are three (3) new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance. o There are four (4) new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance. o The method for calculation of all the WIOA measures will not be the same as under previous legislation. o Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is nine (9) months in arrears. As a result, course

corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor will be working on how to improve reporting; however, as we enter into WIOA we are still working under the current reporting system. o The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)). It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Recognizing the Roles of State and Local Areas/Regions in the Plan: The LS WDB recognizes and applauds the Governor's goals for the citizens, residents and employers of our great state. It is the intent of the local workforce development boards to exert our best efforts to make the Governor's goals a reality for the Commonwealth of Pennsylvania. In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget), and analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the agility embedded in the law to be responsive to local area needs, which vary across the state, by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. Making Work Pay PA submitted the following comments: The Making Work Pay PA Coalition strongly supports Pennsylvania's Proposed State Plan implementing the federal Workforce Innovation and Opportunity Act. The Making Work Pay PA coalition is a state–wide group of advocacy and direct service organizations that have come together to develop recommendations for measures that government can implement to better ensure that low–income families are always better off when parents go to work, work more hours, or earn promotions or raises. As advocates for low–income working families, including families that receive public assistance, our interest in the WIOA State plan is focused primarily on: (i) priority of service for recipients of public assistance and other low–income persons; (ii) Career Pathways programs; and (iii) transitional jobs. More detailed comments supportive of the Proposed Plans provisions in these areas have been submitted by Community Legal Services and the Community Justice Project. The Making Work Pay PA Coalition endorses those comments. We support the Proposed WIOA State Plan because it offers real promise of education, training, and paid work experience for parents whose families receive public assistance and who wish to raise their families' standard of living through employment in jobs that are in demand and pay a family sustaining wage. Pennsylvania's proposed WIOA state plan would provide these families the avenues and opportunities they need to obtain these kinds of jobs. Priority of service for families receiving public assistance was a requirement in the Workforce Investment Act (WIA) and the Job Training Partnership Act (JTPA) before that. For the most part, however, states did not live up to their obligations under this provision. National data show that only 48.7 percent of adult "exiters" who received training and/or intensive services through the WIA Adult funding stream were "low–income individuals" in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients. To address past failures, WIOA strengthens WIA's priority of service requirements. It also adds a promising new adult education opportunity for low–income parents in need of GED, ESL, or

literacy instruction through its emphasis on Career Pathways programs, which offer adult education infused with career counseling and assistance with transition to postsecondary jobs skills training. Moreover, WIOA permits up to 10% of training funds to be used for transitional jobs (subsidized employment) for low–income parents who lack work experience or face other barriers to employment. The following are the specific provisions in the Proposed Plan that we support: Priority of Service We think the plan, as proposed, does a good job of addressing the training needs of low–income parents through strong and mandatory provisions implementing WIOA's priority of service provisions for recipients of public assistance and other low–income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10–12, 2.1 and 2.11) The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what "priority of service" means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67–70) Career Pathways The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions. Transitional Jobs The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this. We urge the Pennsylvania Department of Labor & Industry to retain the above provisions in the final state plan, with the clarifying edits suggested by CLS and CJP in their more detailed comments. Response: We appreciate the comments in support of the State Plan, including: your recognition of the important role our adult basic education services provide in career pathways for low income adults; your comment in support of ensuring that career pathways are accessible to individuals with basic skills needs; your comments in support of the Priority of Service and Career Pathways provisions in the State Plan; and your comment in support of the transitional jobs requirements in the State Plan. Dr. Madeline Seltzer, Manor College, offered the following comment: I am against this combined plan at this time. Parts of the plan are not clear. I would like the Perkins Career and Technical Education parts to be reworked. In addition, I would like implementation to be postponed until Perkins 5 comes up for approval.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. Anne Knop, Manor College, submitted the following comment: Please do not implement the WIOA Combined State Plan at this time. Because parts of the plan are not clear, the Perkins Career and Technical Education components need to be reworked. In addition, I would like implementation to be postponed until Perkins 5 comes up for approval. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the

Governor’s goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. Shirley Collester, Manor College, offered the following comment: I do not approve the combination of the six grant programs authorized under WIOA. At this time, the Perkins Career & Technical Education programs should first be reviewed; thus, postponing the "combination" until Perkins 5 has been submitted for approval. Response: The six core programs are required by WIOA and the commonwealth has no discretion in that regard. Likewise, submission of the state plan is a federal requirement and the commonwealth cannot postpone implementation until a time when Perkins Career and Technical Education is approved. The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor’s goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. Cherie Crosby, Manor College, commented: I am writing to express my concerns about WIOA combined plan. At this time, it seems that that combining plans would adversely affect all involved and that it would best that the decision to combine plans be postponed until revisions in the Perkins Career and Technical Education have occurred as well as feedback from public hearings is thoroughly considered as well has it will impact all who are involved. Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor’s goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan. John Miller, Martin Library, offered the following comments: • Pg 9 – 1.4 & 1.5: When the state “encourages” cross–program funding does encouragement actually have any teeth or utility? A major comment I have heard from the local Economic Alliance is that a lack of soft skills is ubiquitous and problematic for the un and under employed. If the target demographic has trouble with soft skills (and things like time management) to begin with – is it reasonable to assume that they will be able to manage co–enrollment in multiple programs? Response: The law is intended to provide services to individuals with barriers to employment. Funded programs include support services that help participants succeed in their activities. • Pg 10 – 1.9: What weight and/or utility will badges or credentials carry? Will deals be struck with local employers to have hiring preference for those with badges or credentials? If not, is there any real point to them? Response: We appreciate the comment and note that employers will be consulted to ensure that badges and credentials are recognized and valued by local employers. • Pg 14 – 3.6: There are numerous agencies dedicated to improving literacy and increasing proficiency in reading and math. Why does the Commonwealth seek to create tools and models from scratch rather than adopting or partnering with another agency? Response: We agree with the comment and will alter the plan to indicate that the commonwealth will "leverage" tools and models. • Pg 18: How, if at all, will the data be shared with other stakeholders throughout the state? Response: The commonwealth is committed to providing access to data in a manner consistent with the statutes, regulations, and policies governing its release. Tyrone Clark, MGC–ERIE, made the

following comments: • Training Benchmarks: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs: Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements in advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. The plan, in general, does not cover many employer services. The focus is on funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (comments 5.1 through 5.7), ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and market penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High

Turnover Positions: It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. Andy Gehman, MGS Incorporated, submitted the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. David Schultz, Michael Foods, Inc., offered the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment

of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Alicia Lentz, Mifflin County Academy of Science and Technology, commented: I am the administrator of a small Practical Nursing program in rural Pennsylvania who participates in a consortium of other similar schools for Perkins funding. I have been advised by our fiscal agent that the WIOA Combined State Plan being developed is unclear regarding whether or not Perkins program funds would be diverted into CareerLink budgets instead of as grants directly to educational programs. I would request that the committee consider the significant impact of such a change for small programs such as mine and take more time to analyze the data available to make a sound, long term decision. Perhaps time to collect data from education providers in order to analyze the direct impact on similar programs in Pennsylvania could be used in the 2016 fiscal year and a more clear plan developed for Perkins V. Practical nursing is considered a high need occupation in the state and there is data to suggest that the need for LPN's is increasing even more than for RN's, especially related to care of the elderly. Our program has greatly benefited from Perkins funds to allow us to enhance the clinical training required to produce quality nurses to serve the health care needs of our state. I would appreciate information about this proposal to be distributed to affected programs as the impact is significant and potentially detrimental. Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over $2,000 as a result of this alignment. With a decrease of $10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further

information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in–kind or funds. Dr. Molly Kinney, Mifflin County Library, commented: From my perspective, this plan uses the 'traditional' already in place agencies/departments as the means to achieving the goals. While that structure is already in place, there seems to be little creative thinking that would provide other successful models. For example: Goal 4: Engage Employers to Strengthen the Connection of Education and Training and the Economy, Increase Investment in Critical Skills and Increase Jobs that Pay Here in Mifflin County we have the Mifflin County Industrial Development Corporation http://www.mcidc.org/aboutMCIDC.php which promotes the growth of employment and income in Mifflin County. They do not "fit" the usual definition of employers, yet they would be a valuable asset in the implementation of the plan. In addition, we have Business 2 Business, a networking and information sharing group of small business owners who could also be utilized in a variety of ways. Response: Mifflin County IDC currently is a member of the Central Region PREP and plays a significant role in business engagement activities. Dr. Kinney should contact the PREP Coordinator who is located within SEDA–COG to discuss other opportunities within the region. The LWDB will also be reaching out to the economic development agencies in order to develop the regional workforce development plan. Karey Killian, Milton Area School District, commented: I'm a certified library media specialist serving three elementary schools in the Milton Area School District. On my 12–day cycle I see approximately 1200 students. In library classes they are learning life skills such as knowing how to find valid information on the internet, working together with teams to write/develop/produce green screen movies, publishing iMovie book trailers, and learning how to become creative thinkers/inventors/builders/problem solvers with the makerspaces activities. For the purpose of determining how libraries are preparing Pennsylvania's young scholars for the future, students are becoming keenly aware of the endless possibilities for their future careers as they develop skills that encourage critical thinking, creative ideas, the collaborative design process, and making global connections. I try to connect every student at least one time with classes around the globe through Skype so that they have a better understanding of how easy it is to build ideas with other people that may not be located in the same zip code. Makerspaces is one of the best ways for libraries to provide a rich learning environment for all citizens to explore the world of making, inventing, and tinkering. I like to think it's the mission of libraries to provide free resources (more than just books and computers) to everyone in the community. Ingenuity doesn't belong to just those individuals that can afford to purchase things to try something new. Everyone doesn't have access to robotics, STEM related activities, 3D printers, crafts, Legos but everyone can have the opportunity to explore their inventive side when libraries provide the resources, staff and training for individuals to see what they can do. Response: We appreciate your comments about the librarian's role in sparking creativity and developing students with critical thinking skills. Montgomery County Community College offered the following comments: • Perkins: Montgomery County Community College (MCCC) is a postsecondary provider in the Perkins program. The benefits of combining Perkins with the WIOA plan is unclear. Including Perkins in WIOA will add a layer of complexity increasing paperwork and reporting requirements without additional benefit to the students served under the program. The current structure for Perkins has proven effective due to continuous improvements on both the part of PDE as well as the colleges. An increased bureaucratic structure will divert MCCC's efforts from the workforce programs and career services that support students' transition to employment. If Perkins funds are redirected to support the additional bureaucracy under WIOA, this will be at the expense of students where there is already more demand for Perkins services than funds available to support them. Linkages to WIOA already exist at the state level in the form of the career pathways that are tied to the HPOs identified by the PA Department of Labor and Industry. Locally, Montgomery County Community College is committed to partnering with the Montgomery County Workforce Development Board, MontcoWorks, to ensure that the local workforce is better prepared and moving into high growth jobs. Dr. Linksz, Interim President, and Dr. Victoria Bastecki–Perez, Vice President for Academic Affairs and Provost, are active members of the

MontcoWorks Board. The College has a strong relationship with MontcoWorks that includes their participation in the Perkins efforts. A representative of MontcoWorks is a member of MCCC's Perkins Committee. The representative assists the College in focusing its strategies more effectively to increase students' skills through the resources available through Perkins. MontcoWorks and MCCC are committed to career pathways and the MontcoWorks representative also shares information on the efforts of other workforce boards and colleges to strengthen career pathways. In addition, best practices at MontcoWorks regarding career counseling and job search assistance are shared at the Perkins meetings. Response: As the commenter indicates, Perkins does require involvement of LWDBs. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted the recipients will have to document and assure compliance. The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. Community colleges have a good working relationship with PDE. • KEYS: Montgomery County Community College (MCCC) is a KEYS program provider. In order to expand career opportunities for participants in the KEYS program, the College is recommending that noncredit pre–employment career programs be included as allowable training. Noncredit training programs are designed in conjunction with business and industry to ensure that relevant in–demand technical and workforce skills are taught as a short–term training alternative in helping them be more marketable–sooner. Basic skills are improved through contextualized learning and job readiness preparation training. These programs typically articulate to credit through prior learning credit. For example, MCCC's Office Assistant Certificate program, which is a 16–week competency based program that includes micro–credentials, stacks for nine credits to the credit Office Management Certificate which is one of the pathways to the Management AAS degree. Response: The obtainment of employment is the priority of the program. Program specific questions can be answered by the KEYS coordinator at the college. • Engagement with Educational Institutions: For the sixth time, in December 2015 Victory Media designated Montgomery County Community College (MCCC) as a "Military Friendly School." The College is willing to share its best practices with other colleges and universities. All branches of the armed forces receive prior learning credit for basic training and discharge. There is the potential of receiving additional credit for other types of military training. A Veterans Resource Center (VRC), located in a renovated farmhouse at MCCC's Central Campus in Blue Bell, plays an important role in the lives of the institution's veterans. Here, students can meet with Veterans Services staff, participate in study groups and tutoring, and build an important support network with their peers. Orientation and advising services are part of the mix as well as educational offerings that are geared towards veterans. The Student Veterans Organization meets weekly in the VRC and functions like a student club. The group engages in advocacy and education around veterans' issues and participates in a variety of community service opportunities. Response: The commonwealth congratulates MCCC on its designation as a Military Friendly School and is grateful for MCCC's offer to be a source of Best Practices. Neighborhood Allies, Northside Common Ministries, and Oakland Planning & Development Commission jointly offered the following comments: This letter is a response to the draft Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the period of July 1, 2016 through June 30, 2020. We appreciate the opportunity to provide comments on this document that will guide state and local efforts to support struggling families. • Page 188 of the PA Combined State Plan addresses "Work and Self–Sufficiency" for TANF recipients and asserts that, "The primary means to achieve self–sufficiency is through work. The program emphasizes a work–first approach as part of a continuum of services which can establish a work history, with increasing wages and benefits that lead, over time, to economic independence and

self–sufficiency." We agree that employment is pivotal for low–income individuals; however, we believe that a job is often not enough to reach self–sufficiency. Research from the Urban Institute shows that adults entering workforce development programs have several financial challenges beyond unemployment , which, taken together, can create barriers to getting a job and limit a household's ability to become financially stable. Organizations that work with individuals to address workforce skills gaps can integrate additional services into their programming to address households' financial challenges in ways that lead to longer–term stability. Programs like the Financial Opportunity Centers (FOCs) that we have launched and continue to support in the Pittsburgh region at Mon Valley Initiative, Northside Common Ministries, and Oakland Planning and Development Corporation offer opportunities to improve knowledge, skills, and access to affordable financial products (such as credit–building loans called Twin Accounts™) through financial coaches, who supplement workforce services offered by employment counselors. Helping unemployed and low–income residents of Pittsburgh and Allegheny County to become more financially secure positively impacts their ability to obtain and maintain employment. The Local Initiatives Support Corporation released a recent report that showed that of 40,000 low–income clients seeking assistance from FOCs, 87% of whom are in the bottom fifth of US income distribution, of those who received bundled services, employment placement rates were 39% (compared with 22% for employment services alone), employment retention rates were 59% (compared with 45% for employment services alone), and 76% showed an increase in net income. (Our three FOCs were not included in this study, since they opened in 2015.) We are happy to see that financial education is listed as an "allowable service" for adults in the WIOA legislation, and urge the PA State Plan to include additional services focused on building financial skills such as saving and budgeting, offering access to income supports such as tax credits or food assistance, and that lead to long–term growth in income and wealth. Financial coaching, when bundled with employment assistance and public benefit counseling, has the potential to impact the following WIOA Performance Measures : o Client's ability to stay in employment placement: FOC coaching helps clients stabilize other aspects of their financial lives – like housing, childcare and transportation – that can interfere with employment retention. Coaching also helps clients address sources of financial stress – like credit card debt – that can interfere with productivity and performance on the job. o Client's ability to increase earnings: FOC coaching has been shown to have an impact on increasing earnings for participants that are financially vulnerable compared to control groups. o Career Center's ability to serve employers: FOC coaching has the potential to reduce employees' financial stress and increase their productivity at work, benefitting both the employees' financial well–being and the employer's bottom line. Response: We appreciate the information provided by the commenter and agree that financial coaching is a beneficial service. • Pages 67–70 of the PA State Plan discusses "Priority of Service for Recipients of Public Assistance, Other Low–income Individuals, and Individuals who are Basic Skills Deficient," and provides the requirement under WIOA Section 134(c)(3)(E) that the commonwealth, LWDBs, and PA CareerLink® centers shall provide priority for Title I individualized career services and training services to the following: o recipients of public assistance, defined as SNAP, TANF, SSI, or state or local income–based public assistance benefits; o low–income individuals, defined as those receiving public benefits, those with total family income lower than either the poverty line or 70% of the lower living standard income level, homeless, those eligible for free/reduce price lunch, foster child, and qualifying individuals with disabilities; o individuals who are basic skills deficient, defined as youth with skills below 8th–grade level or youth/adult unable to compute or solve problems, or read, write, or speak English at a level necessary to function in a job, family, or society. Further, the plan requires that data are obtained reflecting the numbers of people served for each of these three categories, that outreach will be targeted to reach those potentially eligible, and that eligibility will be screened at point of entry. Once screened, eligible people will be assessed to identify barriers to employment and the services needed to address them. We know from CFED's Assets & Opportunity Local Data Center that the liquid asset poverty rate for Pittsburgh is over 40%, and that there is a significant racial wealth

divide. According to the University of Pittsburgh's Center on Race & Social Problems, 15% of Whites and 33% of Blacks live in poverty and 59% of Whites own homes, while only 34% of Blacks do. Unemployment between 2007–2011 averaged 7% for Whites and 17% for Blacks in the city. Our Financial Opportunity Centers serve a majority of these priority–of–service recipients. Each center determines participants' status through an intake process that collects basic demographic data, assesses barriers to employment, screens participants' eligibility for public benefits, and assists them to access any relevant benefits. In short, the Financial Opportunity Centers supported by Neighborhood Allies in Pittsburgh and Allegheny County serve a priority population for the WIOA legislation, and address challenges to employment and income through a bundled approach that has been proven to be successful. The PA Combined State Plan should address methods such as program integration and financial coaching for achieving the goals set out in WIOA. Response: We appreciate the comments and encourage LWDBs to coordinate with programs such as the Financial Opportunity Centers as appropriate. North Central Workforce Development Board offered the following comments: • Training Benchmarks (WIOA Plan, pg. 10): Please consider setting broader benchmarks that actually encourage cross–program/cross–department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. For example, participants can be co–enrolled in Title I, Title II, Title IV, or EARN programs to name a few partners, all of which financially support adult, dislocated worker and youth participants in training and increasing employability skills; however the proposed minimum expenditure requirement for Title I puts the financial burden on Title I partners and doesn't account for the leveraged training resources of the Adult Education, Vocational Rehabilitation, EARN providers and other partners. It is also recommended the following be considered with respect to Title I training expenditure goals: o Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures. o Include training conducted under other funding, including but not limited to Trade Act, American Apprenticeship, H1–B, National Emergency Grants, Rapid Response, and National Dislocated Worker grant programs, to offset the training target. o Encourage dual enrollment of the one–stop partners and include each partner's contribution. o Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. o Include the cost of registration, books, lab fees and other supportive services. o Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out–of–school youth minimum expenditure requirements are calculated. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We have also clarified that the 10 percent administrative funds will not be included when calculating training benchmarks. • Priority of Service (WIOA Plan, pg. 67): Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to "priority of service": o Exclude dislocated workers as their eligibility is not based upon barriers. o Include those individuals who fit in the local board definition of not earning a "self–sufficient" wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service. o When evaluating a local board's performance base it on outreach rather than enrollment. While you can inform the customer of options you can't make them participate. It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers. Response: We appreciate the comment and agree that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Performance Measures: It is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act, because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included

in the determination of the WIOA measures next year. It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Recognizing the Roles of State and Local Areas/Regions in the Plan – Allowing for flexibility and innovation: In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget) and analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the state by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA. This will not only allow for local responsiveness but also encourages innovation which is core to the legislation. Examples of where the plan is "getting into the weeds" can be found on the following pages: 16, 17, and 29. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. • Mandatory funding for Industry Partnerships: "The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi–employer workforce intermediaries that serve employers with common skill needs in their local workforce areas." While the North Central WDB fully supports Industry Partnerships and has managed both the Manufacturing and Health Care IPs for many years we don't have the resources to fund these initiatives; especially if the mandated training requirements for individuals meeting priority of service are maintained (first point above). We think it is critical to maintain sector partnerships as outlined in the legislation but need additional state funds to support these efforts in order to be successful and remain important to our employers. Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. • PWDP: "Non–Discrimination and Accessibility" Q: The Commonwealth Methods of Administration (MOA) as mentioned, when was the latest MOA implemented and for what time period? Is an email version available for the LWDAs? Response: The MOA was last updated in 2014. A link to the current MOA is included in the Assurances section of the State Plan. • PWDP: "In collaboration with one or more centers for Independent Living and the Office of Deaf and Hard of Hearing, the Commonwealth will evaluate the physical accessibility of all PA CareerLink® offices and services annually to ensure that Pennsylvanians with a disability are able to fully avail themselves of PA CareerLink® services." Q: When will the first annual evaluations as such for the PA CareerLink® centers commence and who specifically will do the reviews? Q: Will the Commonwealth provide, to the individual PA CareerLink® center, a Monitoring Questionnaire that must be completed and submitted to the Commonwealth by the Site Administrator prior to the actual review commencing? Response: Physical and programmatic accessibility evaluation is part of the PA CareerLink® certification and continuous improvement process which must be conducted at least once every three years. It has not yet been determined when such evaluation will commence, however, it has been recommended that the Department require only a 1–year initial WIOA one–stop system certification be conducted prior to June 30, 2016, to be followed by a 2–year recertification process to be completed by June 30, 2017. Both initial and subsequent PA CareerLink® certifications must include an evaluation of the physical accessibility of all PA CareerLink® offices and services. Department guidance is being developed which will address the

PA CareerLink® certification process in detail. • PWDP: “PA CareerLink® staff members receive refresher Training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. Each office is required to develop an Enhancement Plan for providing services to persons with disabilities”. Q: To ensure the Enhancement Plans are consistent in text, will the Bureau provide the PA CareerLink® centers instruction and/or a template to follow? Q: Will the individual PA CareerLink® center be required to submit the Enhancement Plan to the Bureau for their review? Q: Are individual “Affiliate” PA CareerLink® centers required to have their own Enhancement Plan? Q: Will the individual PA CareerLink® center be required to provide the LWDB with the Enhancement Plan approved compliant by the Bureau? Q: What will be the longevity of Enhancement Plans? Response: The commonwealth is currently developing guidance with regard to certifying each of the PA CareerLink® centers. • PWDP: “The Division of Adult Education requires all Title II programs to be ADA compliant and mandates that programs have reasonable materials available for students to use to accommodate learning differences.” Q: Will the Division of Adult Education conduct ADA Monitoring Reviews to ensure applicable compliance? Q: What all is considered “reasonable materials”? Providing LWDAs with a listing of the materials needed to be available would be helpful and ensure consistency. Response: The Division of Adult Education reviews ADA compliance during its overall onsite monitoring visits. Guidance on reasonable materials is available on the Pennsylvania Adult Education Resources website. • PWDP: “Working in close partnership with the LWIA, along with PA CareerLinks and LWDBs, RRCS developed an outplacement curriculum delivered to affected workers that uses comprehensive, customizable workshops and a proven “Surviving a Layoff” publication.” Q: Is an email version of the publication available for the LWDAs? If so, where? Response: An email version of "Surviving a Layoff" publication is currently not available. However, the Rapid Response staff in the respective local areas can provide a copy of the publication upon request. • PWDP: “The Commonwealth is in the process of establishing a State Office of Apprenticeship Training (OAT)”. A specific “Point of Contact” as such will be most helpful and is greatly appreciated by Business Service Team staff. Q: When do you anticipate the OAT will be in place and operational? Response: The OAT was operational effective February 9, 2016. Eric Ramsay is the Director of the Office of Apprenticeship Training. • PWDP: “Every local workforce development board will be required to have a youth standing committee …”. C: Under the WIA the Youth Councils were very beneficial to the successful implementation of services to Youth. The WIOA Youth Standing Committee for the Local Areas is most welcome and appreciated because of the previous Youth Council’s input. Response: We are pleased that the commenter supports this requirement and agree that standing Youth committees are integral to the successful provision of Youth services. • PWDP: “…Local boards will establish criteria to ensure that newer provider entities with less professional experience in the provision of youth services are afforded the opportunity to compete with more established providers for a contract. Criteria will also be established and included in contracts that outline the right of the local board to terminate a provider’s contract for cause, such as fraud or failure to meet established performance standards.” Q: To ensure the contracts are consistent in text, will the Bureau provide the LWDAs a template to follow? Response: We appreciate the comment but it is not relevant to the state plan. The Department does not intend to provide a template with regard to such contracts. • PWDP: “…the Commonwealth is designing a paid summer internship program for disadvantaged youth ages 16–18. This 8–week program will kickoff during the summer of 2016. Multiple state agencies and offices, including PA CareerLink® centers, will serve as worksites providing opportunities for valuable work experiences, with a strong focus on “soft skills” to area youth. State staff will act as supervisors/mentors for youth participants.” C: A Youth Program as such is greatly appreciated. Within our local area, at PA CareerLink® centers, our Workforce Development Youth Case Managers have/do provide “Work Experiences” to youth. The Youth Counselor acts as the “Lead” Supervisor/Mentor. This activity has proven to be very beneficial to participating youth. The proposed “State 2016 Summer Internship Program” is certainly welcome, especially for disadvantaged youth this age group. Response: We are pleased that the commenter

supports the proposed Summer Internship Program. • PWDP: “The Department of Labor & Industry is the lead agency in the development of the internship program framework, which includes the development of training plans, the recruitment process for eligible youth, and the assignment of youth to worksite rotations based on identified areas of interest.” C: We are anxious to review the text of the “Training Plans” and review the recruitment process that will be required. Q: Will the LWDAs be required to have an executed “Worksite Agreement” in place for each Summer Internship Program Worksite? Q: If “yes”, …to ensure the “Worksite Agreements” are consistent in text, will the Bureau provide the LWDAs with instruction and a template to follow? Will it include PII? Response: We appreciate the comments and questions related to Pennsylvania’s Summer Internship Program for Youth (PA SIP). The details surrounding this program, in preparation for summer 2016, are currently still under development. However, we have developed a "Training Plan Template" document that will be used by the designated supervisors (commonwealth staff) at each of the PA SIP internship sites around the commonwealth to plan for the day–to day activities of the intern(s) assigned to that office. LWDA staff affiliated with any of the PA SIP field sites may also request this template from BWDA or BWPO for review. The recruitment process for PA SIP is being coordinated at the state–level through the PA Department of Education (PDE), who will work with school administrators around the commonwealth to identify and nominate a specified number of students for the limited number of available program slots. Worksite Agreements are one of the possible program framework elements that the Department is already in the process of discussing. LWDAs will be certainly be notified should they be required to be a party to such an agreement. Courtney Fasnacht, Northeast PA Manufacturers and Employers Council, Inc., submitted the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth’s workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area’s federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today’s increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Northeast Pennsylvania Manufacturers and Employers Association submitted the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. John Feraco, Nova Chemical and SW Corner Workforce Development Board member, submitted the following comments: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I

funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

• PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Jen Agosti, Nurse Sharks, Inc., offered the following comments: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development

Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify) :NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the

introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29): This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. The Northwest Workforce Development Area Chief Elected Officials submitted the following comments: As you receive public comment on Pennsylvania's WIOA Combined State Plan 2016–2020, we urge the Department to address the following issues that could impact service delivery in our area. In general, we are requesting the commonwealth consider three areas of the plan autonomy so that the local board and elected officials have the ability to meet the needs of the local job seekers and employers, liberal definitions for training and priority of service, and more support for employers in the commonwealth. Autonomy will provide the local board the ability to meet the spirit of the federal law, WIOA, when making decisions while meeting the needs of local job seekers and employers. Finally, employers seem to be missing from the commonwealth's plan with the exception of Industry Partnerships and High Quality Jobs that appears to mean that local boards will be required to prioritize services to employers with higher paying jobs. • Training Benchmarks: The prescriptive spending requirements in the commonwealth's plan, in excess of the requirements in WIOA, limits the local board's and elected officials' ability to respond to customer's needs. In addition, the requirements will limit the funds available for important services to job seekers and employers unless the definition of training is broad enough to include one–on–one assistance to job seekers that have barriers to employment. These are the very clients that are targeted in priority of service. The requirement will also limit the funding available for business services and industry partnerships. Industry partnerships were not funded in the region (eight counties of northwest Pennsylvania) leaving the Title I dollars to fund the continuation. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: WIOA clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. The 70% threshold is intrusive of the ability of the local board and elected officials to determine how best to meet the needs of local customers. We have critical needs to assist recently dislocated workers at companies like Joy Mining and General Electric Transportation Systems and these individuals would not qualify for the threshold. It is important that boards remain autonomous to meet the needs of the local area. In addition, the disconnect between working with individuals with barriers and the service that is needed to effectively assist them while meeting the expectation of training is very real. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • The term High Quality Jobs is concerning as it appears to mean that those employers that are not providing a high wage or have high turnover in entry level positions will not receive a high priority of service. In our area we are experiencing significant layoffs for various reasons in some of our highest paid positions with few equal replacements for the dislocated worker. While we agree that the effort needs to focus on family sustaining wages and employers that are willing to work with job seekers that are of a varied background; we must be realistic in that most of the job seekers that are being prioritized will only obtain skills to provide them an entry level position with many of our local employers. We are taking this seriously in that we have taken steps to begin to diversify the regional economy and encourage entrepreneurship. The flexibility to do what is needed locally should be encouraged in the commonwealth's plan for areas/regions that continue to meet the spirit of WIOA. Response: Focusing limited workforce development resources to employers offering high quality jobs is a priority of the Governor. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. The Northwest Workforce Development Board

submitted the following comments: • Training Benchmarks: The NW WDB is aggressively moving to a service model that will reduce Title I dollars for infrastructure. As this model is being developed, the NW WDB embraces moving more Title I funding into training and industry partnerships provided the training meets the needs of local employers while achieving performance measures. Clarity around what is considered training (ITAs, OJTs, Title II, Dislocated Worker, RR, etc.) will be helpful in the development of our regional and local plans. The exclusion of dislocated workers and enforcement of priority of service could be problematic at this time. Recent layoffs at General Electric Transportation Systems and Joy Global have created a significant influx of dislocated workers in the PA CareerLink(R) offices. The plan does not specifically address the needs of dislocated workers and the priority of getting them back to work. It is our expectation that a broad definition of training will be included. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Employer Services and Industry Partnerships: Definitions around Quality Entry Level Jobs, High Quality Jobs, the Right Employers, and Industry Partnerships require clarification. In order to engage employers on the local WDBs and the Industry Partnerships, the commonwealth's plan must be inclusive and not exclusive. It appears that these terms are for selecting certain employers and limiting business services to some employers. Industry partnerships are discussed throughout the plan and in some sections it appears they are to be funded by the WDBs and in other sections (p. 47) it appears the commonwealth will fund them. Please provide clarity on these four terms. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. Focusing limited workforce development resources to employers offering high quality jobs is a priority of the Governor. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. Regarding Industry Partnerships, the state believes funding support for IPs must be a combination of state and local resources. • Strengthening Data and Sharing: We support strengthening the data collection provided that the data is shared with the local WDBs to the extent allowed by federal law. Confidentiality in the WDB is common practice. Sharing data with the WDBs would provide the system an opportunity to respond quickly to the needs of the local area. It is requested that the commonwealth amend the state plan to include the sharing of information. Response: The commonwealth is committed to providing access to data in a manner consistent with the statutes, regulations, and policies governing its release. • WIOA section 107(d) states, local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent, and analyzing local conditions so they can make informed determinations on the type, mix and investments in services and training with their WIOA allocations. It is respectfully submitted that the commonwealth consider the benefit of allowing local boards the flexibility to be responsive to the local area needs. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. The Oil Region Alliance of Business, Industry & Tourism submitted the following comments: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system

provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market

Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29): This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. Community Legal Services and the Community Justice Project on behalf of Success Against All Odds (SAO) and Just Harvest submitted the following comments: Enclosed are comments from Community Legal Services and the Community Justice Project on behalf of Success Against All Odds (SAO) and Just Harvest in strong support or Pennsylvania's proposed WIOA State Plan. Success Against All Odds is a statewide organization of current and former recipients of Temporary Assistance for Needy Families (TANF) and/or the Supplemental Nutrition Assistance Program (SNAP) who are seeking to achieve or have achieved economic independence by pursuing Community College degree and certificate programs preparing them for jobs in High Priority Occupations. Just Harvest is a non–profit organization in Pittsburgh that engages in advocacy to end hunger and poverty. Their work includes connecting families with public assistance programs, which among other supports, can provide access to education and training. Our comments focus on: (i) WIOA's priority of service for recipients of public assistance and other low–income persons; (ii) Career Pathways; and (iii) Transitional Employment. In our comments, we give the Department very high grades for the very specific requirements and guidance provided in these areas of critical importance to low–income families. We urge you to retain these provisions in the final WIOA State Plan. Please note that our comments are supported by two statewide coalitions that advocate for low–income families, including families receiving public assistance: the Coalition for Low–Income Pennsylvanians (CLIP) and the Making Work Pay PA coalition. The Coalition for Low Income Pennsylvanians (CLIP) is a group of 34 diverse organizations from across Pennsylvania including the faith community, service providers, legal service advocates, anti–poverty and anti–hunger groups, children's advocacy organizations and community action agencies. CLIP's primary mission is to protect individuals and families who struggle against the ravages of poverty by advocating for responsible, compassionate, and cost–effective government policies. The Making Work Pay PA Coalition is a statewide group of advocacy and direct service organizations that have come together to develop recommendations for measures that government can implement to better ensure that low–income families are always better off when parents go to work, work more hours, or earn promotions or raises. Together these coalitions speak for the following organizations across the Commonwealth: ACHIEVEability * Americans for Democracy in Action * Bucks County Women's Advocacy Coalition Career Wardrobe * Center for Hunger–Free Communities at Drexel University

Coalition of 100 Black Women, Inc.– Pennsylvania Chapter * Community Action Association of PA Community Justice Project * Community Legal Services, Inc. Delaware Valley Association for the Education of Young Children National Housing Alliance of Pennsylvania * JEVS Human Services * Just Harvest Lutheran Advocacy Ministry in PA * Maternity Care Coalition * PA Budget & Policy Center PA Catholic Conference * PA Coalition Against Domestic Violence * PA Coalition Against Rape PA Council of Churches * PA Hunger Action Center * PA Jewish Coalition PA NOW * PA Prison Society * PathWays PA People's Emergency Center * Phila Unemployment Project (PUP) Philadelphia Workforce Development Corp. * Planned Parenthood Southeastern PA Public Citizens for Children & Youth * SEIU 668 PSSU * United Methodist Advocacy in PA United Way of Pennsylvania * Unitarian Universalist PA Legislative Advocacy Network (UUPLAN) Women Against Abuse * Women and Girls Foundation * Women's Law Project Women's Opportunities Resource Center * Women's Way Response: We appreciate the comments in support of the plan. Pam Brauchli, Office of Vocational Rehabilitation, offered the following comments: • This is not an easy document to read. It would help if the names of the core partners in the plan were clearly titled in the table of contents as well as the beginning of each new section. Response: We appreciate the comment. • Several charts and graphs appear in this document. Did you check their accessibility to people using screen readers? Response: States will be required to submit a Unified or Combined State Plan through an online submission system developed by the Department of Education's Rehabilitation Services Administration (RSA). The system features a web–based portal that allows users to enter data and text in response to the Unified or Combined State Plan elements, is 508 compliant, and allows for public posting of approved plans. • WIOA Adult – Does this program include services to Individuals with Disabilities (IWD)? Response: The WIOA Adult program does serve individuals with disabilities who meet program eligibility requirements. • Wagner–Peyser – Does this program include services to IWD? Response: The Wagner–Peyser program does serve individuals with disabilities. • OVR – This section is misleading. Although it uses the word eligible, it's easy to miss. This section makes it sound as though OVR serves all IWD. It should be made clear that IWD who are not eligible for OVR services can be served by the other partners. Response: We appreciate the comment but feel the section is clear that OVR services may only be provided to eligible individuals. • Assessment – It isn't clear how they conduct their assessments. Do they conduct customer satisfaction surveys? Do people have informed choice or appeal rights? Response: We appreciate the comment. WIOA identifies the common performance measures that are required by the six core programs. • "The Pennsylvania WDB has established a standing committee to consider Performance and Accountability." – They should include performance and accountability regarding the provision of physical and programmatic accessibility to IWD. Response: The Performance and Accountability Committee of the PA Workforce Development Board is open to consideration of all metrics and ways to improve service delivery. • Non–Discrimination and Accessibility – This section should include performance and accountability regarding the provision of physical and programmatic accessibility for IWD. What happens if IWD believe they have been discriminated against? What recourse do they have? Response: The referenced section of the State Plan provides a collective and thorough response to the questions that must be addressed therein, with specific regard to accessibility for individuals with disabilities. While performance accountability does have elements of connectivity to this section, such detail may be found in the Department's PA Workforce Delivery System Policy. • "PA CareerLink® staff members receive refresher training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. Each office is required to develop an Enhancement Plan for providing services to persons with disabilities." – Can people request a copy of this plan? Response: We appreciate the comment. Individuals interested in receiving a copy of an Enhancement Plan are encouraged to contact the site administrator of the PA CareerLink® to make such a request. • These statistics go back to 2011. Do they have anything from the last completed calendar year, i.e. 2014? Response: DHS has provided more recent statistics in the final submission of the plan. Julia Barol of PA APSE offered multiple comments to include: • Goal 2, page 10: While working towards "family

sustaining wages” is a priority, it must be noted that not all individuals with significant disabilities may have the ability to earn at this level and we would like to see “increasing wages” as a goal as well. Response: We appreciate the comment and note that in Goal 1.7 and elsewhere in the plan, we encourage placement of individuals with barriers to employment into quality entry level jobs that provide work experience and non–technical skills necessary to lead to employment in jobs that pay family sustaining wages. • Coordination, Alignment and Provision of Services to Employers, Page 50: We are concerned when you write: “All Pennsylvanians exiting basic education services, both through the traditional K–12 system and through adult basic education, will be prepared to participate successfully in postsecondary level instruction with no need for remediation. To support this vision, Title II adult basic education providers are implementing the College and Career Readiness Standards for Adult Education…Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult basic education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution. “ There must be a provision for students who are in special education who may not pass standardized tests. The development of training programs to get youth with significant disabilities ‘ready’ for work is something that we are moving away from as decades of experience has shown that this doesn’t work (see PA APSE White Paper on Employment). We respectfully suggest that wording be included to create accommodations for those students that may not meet the qualifications presented above. Response: The statement referred to in the comment is specifically addressing the role of Title II adult basic education programs in supporting students in those programs to successfully participate in postsecondary education/training. The commonwealth recognizes that students who are in special education may require accommodations. • Distribution of Funds for Core Programs, Pg. 59: o In relations to youth with mental health disabilities: are there funds allocated to support their continuum of recovery to follow them from school to work? o Since there are such significant financial implications, provide clear definitions for terms like “youth” and “graduation” and use consistently throughout. Both the definitions and the attached delineations of funds available are confusing. To avoid confusion about roles and responsibilities and availability of resources, clarify the terms and the roles and responsibilities of each service system. We need to actively provide support to youth still in school. This is when most youth without disabilities should start their working lives. We must ensure that definitions are clear and precise to provide the best outcomes possible for transition age youth. Response: The allocation of funds described is specific to WIOA Title I Youth funds. While funds are not allocated to youth with mental health disabilities specifically, those youth could be eligible to receive Youth services if they are otherwise eligible. We also appreciate the comment around definitions and support the need to clarify terms and the roles and responsibilities of each service system, which will be done through program specific policies. Unfortunately, some definitions differ depending upon the program making it difficult to provide across the board definitions in the state plan. • Page 85: In the definition of ‘youth standing committee’ there needs to be specific mention of the inclusion of professionals with experience in the transition of youth with disabilities from school to work. Response: The make–up of Youth Standing Committees is up to each local Workforce Development Board. We agree with the commenter that professionals experienced in the transition of youth with disabilities from school to work would be valuable assets to Youth Standing Committees. • Page 87: when referencing “disadvantaged youth,” does this include youth with disabilities? Recommend adding wording to include youth with disabilities. Response: We accept the comment and will make a change to page 86 to include a specific reference to youth with disabilities. • Request for Waiver of Statewideness, Pg.113: There are two interagency agreements highlighted in this section as new projects with the goal of replication throughout the state. As this is a four year plan we would like to see a target for additional sites in the state. Response: We appreciate the comment. We will consider additional interagency agreements in the future, depending on available resources. • State Goals and Priorities, page 135: o The goals appear to be out of order and should be changed by age and priority. o Goal 2 should

be first, then Goal 1. Goal 2, number 5 should include “implementation “of the research of best practices of peer mentoring as part of the four year plan. Response: We appreciate the comment but do not feel the Plan needs to be altered as suggested. • State’s strategies, pages 140 – 150: o The PETS needs to have “provision of the above services will result in reaching students earlier” defined. At what age will this begin for students? o The Plan should detail timelines of supports to be provided for transition age youth. o OVR needs to commit to working with transition age youth at a minimum of 2 years prior to exit of school and this needs to be state in the plan. Students in special education oftentimes decide not to stay until 21 and are unprepared when they leave school early. Ideally the last day of school should look like the first day past graduation and in order to have a seamless transition from school to work. This means that appropriate employment should be identified while the student is still in school. The collaboration between OVR and PDE doesn’t exist if this is not the goal. o Braided and blended funding options must be a part of the plan so that the student does not suffer from bureaucratic disagreements on payer of last resort. o Adult training facilities have no place in both assessment and volunteer/work opportunities while in school or post–school transition. These need to be fazed out as part of the OVR plan. o OVR’s Early Reach initiative needs to be expanded to meet the needs of youth with disabilities. There are too few counselors currently. There needs to be additional training of counselors and on–going training of evidence based practice to inform/educate youth and families on the process of transition. o Build the capacity of PA’s employment professionals to support people with the most significant disabilities and to address barriers to employment which are related to misunderstandings about the relationship between SSA benefits and working. OVR counselors and CRPs must have a basic understanding of the fundamentals of work and benefits. o Support to encourage more CRPs to hire and train Community Work Incentive Counselors (CWICS) is desperately needed to help overcome barriers to employment. There are CRPs currently in PA that have committed to in house CWICs and should be used as a model for other CRPs in PA. o There should be specific training required of CRP to build capacity of employment specialists to be successful in obtaining and maintain employment for people with disabilities o Consider during this transition period for CRP’s and agencies to sponsor and pay for training; make training mandatory for CRPs o When providing employment services, there is no failure for a person. If the person is not successful then we, as professionals, haven’t figured it out yet. For this reason, training in evidence based practice is so important. o We request that OVR’s SE policy that is currently in revision to reflect the new WIOA regulations to be put out for public comment. Response: We appreciate the comments. Updates in the Rehabilitation Act of 1973 as amended in WIOA prioritize “Pre–Employment Transition Services” for students with disabilities ages 14 –21. OVR has expanded its service definitions to include “Pre–Employment Transition Services” that will help direct individuals with disabilities who are still in high school into more competitive, integrated forms of employment. OVR will consider braided and blended funding options to further innovative collaboration efforts between OVR and PDE. We appreciate the comment on adult training facilities and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. We also note per the last comment that OVR’s Draft Supported Employment Policy is planned to be released for public comment in Spring 2016. • Overall recommendations: o Commit to training that is consistent across all the various departments; same philosophy, same process, same implementation while remembering one program doesn’t fit all. o The document should maintain a holistic approach which is intrinsic to collaboration and necessary for the success for people with disabilities. This holistic approach needs to be reflected across agencies/providers. o Make sure all trainings and materials are fully accessible for people with disabilities. o The use of the Hiram G. Andrews Center should be used across all state agencies for training. This way the center will not be a segregated setting and financial support of the center can be spread out across state agencies and thereby free up additional dollars for OVR services. Thank you for the opportunity to comment on the combined state plan. We have also attached a white paper on employment that further expands on areas of focus for Pennsylvania as it moves towards

Employment 1st for people with disabilities. Response: We appreciate the recommendations and will discuss them in our regular interagency work group meetings. The PA Commission for Community Colleges offered multiple comments to include: • The Pennsylvania Commission for Community Colleges (Commission) submits the following comments on Pennsylvania's proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan (State Plan). As the representative for Pennsylvania's fourteen public community colleges established under Article XIX–A of the Public School Code of 1949, the Commission has specific interest in the Commonwealth's workforce system, and the impact of state policy on our member colleges. As such, the Commission offers the following comments on the proposed State Plan. The Commission's membership – Pennsylvania fourteen public community colleges – are a key component of the Commonwealth's education and workforce systems, having served more than 313,000 students statewide in FY 14–15. The Commonwealth should utilize the significant experience of the colleges in serving the targeted populations with career programming, job placement services for graduates, internships, practicums, and clinical experience for career programs, and working with employers on a local and statewide basis to improve the state's workforce system. Response: The commonwealth appreciates this comment and looks forward to working with the community colleges in carrying out the state plan. The community colleges are a key element in the workforce development system in the commonwealth, as is evidenced by the number of initiatives that are referenced in the plan that include community colleges as partners. • Inclusion of Perkins in the State Plan: The Commission recommends excluding Perkins from the State Plan. The benefit of including Perkins in the State Plan is unclear, and any benefit would be greatly outweighed by potential setbacks. In addition to the increased bureaucratic hindrances that could occur, combining Perkins with the WIOA could result in a decrease of funds available to postsecondary Perkins providers such as community colleges. Pennsylvania's community colleges have a longstanding history of managing Perkins funds effectively to link education, course alignment, and training to workforce needs. Working collaboratively with the Pennsylvania Department of Education, the colleges have developed extensive expertise in to successfully serve the students and clients of the workforce system. It is unclear what the benefits would be achieved by restructuring this high functioning portion of the Commonwealth's workforce system. Additionally, the demand for Perkins services already exceeds what the existing appropriation can support. Any diversion of funds to new overhead and/or administrative costs will harm the students and clients of the system. Additionally, the Commission and the members it represents have a strong working relationship with the Pennsylvania Department of Education (PDE) in regards to the use of Perkins funds. As such, there is reason to question the incorporation of this academic and career development support structure into the WIOA plan. Finally, because the Perkins program is currently being considered for reauthorization by the U.S. Congress, including the Perkins in the Commonwealth's WIOA plan might result in increased compliance difficulties upon reauthorization. If the Commonwealth would unfortunately proceed with the integration of Perkins within the State Plan, the following issues should be clearly defined: o How will these changes impact the Perkins Career and Technical Education program? o Will educational institutions receiving Perkins funds be required to use part of their Perkins allocation toward WIB services? o Will institutions be restricted in how they use their Perkins funds, i.e. specific programs or activities? o Will development of career pathways be a requirement for Perkins funding? o Are there specific industry sectors that will need targeting for career pathways? o Will it be a requirement to develop partnerships with WIBs or employers for Perkins funding? Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re–evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore,

we have decided to include Perkins as part of the WIOA state plan. PDE appreciates the thoughtful questions. Perkins mandates must still be met. The programs of study must continue to be developed and offered. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients based on the WIOA mandates. This means there will be additional documentation and assurance and reporting requirements in order to be compliant with WIOA. Federal Perkins regulation must be met which means each Perkins recipient must still meet Perkins and the development and offering of the programs of study. Where WIOA requirements for career pathways align with the Perkins programs of study, the expectation is that an alignment of the program of study to the career pathway occur. Perkins requires recipients to work with the WDB. This mandate still exists. Community colleges have excellent relationships with WDBs. • KEYS Program: The Commission recommends that the Commonwealth reconsider the inclusion of the KEYS program in the State Plan and if KEYS is retained as part of the combined state plan, steps be taken to ensure that the KEYS program providers retain the flexibility that makes the program so effective. Pennsylvania's community college KEYS providers have strong relationships with their respective County Social Services approved training program's flexibility risks being taken away if KEYS is rolled into the WIOA. A more general workforce system does not take advantage of the close working relationships established by the community colleges. Any loss of funding or flexibility would only hinder the positive impact this program provides. Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program. • Performance Measures: The Commonwealth should ensure that education providers are assessed on multiple measures of performance and not rely solely on employment as a training provider performance measure. The Commonwealth should consider increased emphasis on completion of academic credentials as a performance measure. Difficulties associated with tracking students' employment upon degree completion, and barriers to successful employment e.g. failed drug screening, inability to pass credit checks, psychological or medical conditions labeling them as unemployable, must be considered in the development of performance measures. Without increased accuracy of data reporting and additional funds for wrap around services to address the barriers, measuring providers on a limited set of measures is cause for concern. Response: We appreciate the comment and note that credential attainment is a required performance measure in addition to employment. • Career Pathways: The State Plan envisions a system where career pathways are diverse with multiple entry and exit points. The Commonwealth could be served in this regard by utilizing community colleges as a key entry point, taking advantage of the benefits and relationships the community colleges have to offer. The community colleges are an ideal entry point on a career pathway, as they offer ABE/GED, KEYS, workforce development training, and certificates and associates degrees, often times with alignment to further postsecondary study. Response: The commonwealth also views community colleges as a key entry point for career pathways. However, due to the numerous and varied needs of our constituents, they cannot be the only entry point. There are many rural areas of the commonwealth without adequate access to comprehensive community college services. • Importance of on–the–job training (OJT): OJT and apprenticeship opportunities are an important component of the Commonwealth's workforce system and should be supported financially. Coordinating these efforts with resources such as WEDnet, industry partnerships, and microcredentials from Pennsylvania's community colleges will increase awareness and efficacy of these training/development programs. Response: The commonwealth appreciates this comment and agrees that community colleges offer a significant opportunity for coordination with LWDBs, WEDnet and Industry Partnerships. The plan requires LWDBs to meet targets for expenditures devoted to training. OJT and apprenticeships are among the activities included as training for the purpose of this requirement. • Support of veteran outreach: Pennsylvania's community colleges have long been recognized for their services to veterans, their dependents, and active military, and can serve as a valuable source of knowledge and expertise as models of best practices for providing services to this population. In 2015, the Community College of Allegheny County, Bucks County Community College, Butler County Community College, HACC –

Central Pennsylvania's Community College, Northampton Community College, Community College of Philadelphia and Reading Area Community College were named to the Military Friendly Schools® list, which means that they exhibit leading practices to support military students. Five schools have official chapters of the Student Veterans of America: Community College of Allegheny County, Butler County Community College, Lehigh Carbon Community College, Montgomery County of Community College and Community College of Philadelphia. Several other schools have clubs for veterans that are unaffiliated with national groups. Four schools – Community College of Beaver County, Bucks County Community College, HACC – Central Pennsylvania's Community College, and Montgomery County Community College – were selected to participate in the US Department of Veterans Affairs' Yellow Ribbon Program for the 2014–15 academic year. The Commonwealth should consider utilizing the colleges' expertise in this area as part of the State Plan. Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice. • Services to Rural Pennsylvania, Page 21, paragraph 2: Pennsylvania's community colleges provide programming that is available to every Pennsylvanian, including those in rural areas of the Commonwealth. The colleges collectively operate 118 instructional sites, with 27 sites located in rural counties and the colleges are continually adding programs to their online offerings. In the 2012–13 academic year, one out of every eight Pennsylvania community college credit students resided in a rural county. At two community colleges: Butler County Community College and Pennsylvania Highlands Community College, 95% of the credit student population resides in a rural county. Recent expansion into Jefferson, Clearfield, Elk, and Clarion counties continues to garner interest among students. The Commonwealth should utilize the experience of Pennsylvania's community colleges in provided quality academic and workforce programming to expand offerings to additional rural regions in the state. Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to its residents. The commonwealth will look to all of its partners in seeking the best way to serve the rural regions that are not currently served. • Governor's Set–Aside Funding: Support of business–education partnerships is a critical component of a successful state workforce strategy. The Commission recommends that a portion of the Governor's discretionary funds under WIOA be allocated to community colleges to convene business–education partnership forums in local areas to expand and scale existing programs and share best practices. The colleges have existing relationships with employers within their respective communities and can use these relationships to form the basis of these forums. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds. • Community College representation on Youth Committee: Community colleges have extensive experience serving youth aged 18–24, and as such would contribute significant value to the Youth Councils and relevant subcommittees. The Commission recommends that community colleges be required representatives on state and local Youth Councils and relevant subcommittees where the service areas overlap. Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce development board and subcommittee membership is determined by local elected officials and local boards. • Community College representation on all WIOA boards: As a leading provider of education and workforce training in the Commonwealth, the Commission recommends that Pennsylvania's community colleges be appropriately represented on all boards and subcommittees, including a designated spot on the State Board for a community college president. Community college representation on these boards and subcommittees would help to ensure the expertise of the colleges can be leveraged throughout the workforce system and can assist in policy development. Response: The Workforce Innovation and Opportunity Act does not require the appointment of community college officials to be placed on the state board, although it

does allow for it. The members of the PA Workforce Development Board (State Board) are appointed by the Governor. While not required, we note that there are currently two community college representatives on the state board, one of which is a community college president. WIOA Section 107 (b) (2) (C) (ii), pertaining to local board composition, states each local board "shall include a representative of institutions of higher education providing workforce investment activities (including community colleges)." The commonwealth must certify local board composition to ensure all required entities are appointed. • Expansion of the PA–TIP program to include CIP 51: The PA–TIP program was designed to provide additional financial assistance to students to complete credentials in areas of critical workforce need. In many areas of the Commonwealth, health care occupations represent a growing employer need. The Commission recommends that CIP 51 be added to the list of eligible programs for PA–TIP to meet the current and future workforce growth in the health care field. Expanding the eligible PA–TIP programs to include the health care industries would provide much–needed financial assistance to students seeking to be employed in these critical occupations and assist students to secure employment in these industries. Response: PA–TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request. PA State Representative Tina Pickett offered multiple comments to include: • While there is certainly value to upskilling the commonwealth's workforce, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training will negatively impact the delivery of valuable career and business services in my area. In rural counties without PA CareerLink(R) sites, WIOA funds support the staff and overhead for those counties. These are the same counties that have no forms of public transportation and these cuts would result in reductions in services or even the downsizing or closure of facilities. The training benchmarks ignore the many other valuable services the local workforce system provides to businesses and job seekers. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities, especially in rural areas. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks is of value in today's increasingly tech savvy society. However, the reality is that many customers, especially rural customers, do not have adequate internet service, strong technology skills or access to computers. There are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink(R) centers and affiliate sites that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

PA State Representative Neal Goodman offered multiple comments to include: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks(R) in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. PA State Representative Jerry Knowles offered multiple comments to include: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected

officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. PA State Representative Gerald Mullery offered multiple comments to include: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks(R) in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve

those individuals that do have access to technology. Homer C. Floyd of PA NAACP commented: Thank you for affording the Pennsylvania State Conference of NAACP Units an opportunity to comment on your proposed Workforce Innovation and Opportunity Act Combined State Plan. We are extremely supportive of its provisions to emphasize: • career pathways as the primary model for skill, credential, and degree obtainment, • expanding the pipeline of workers for targeted industry sectors through industry partnerships, WEDnetPA and other innovative strategies, • providing opportunities for youth to participate in work based learning, • engaging employers directly to close the skills gap and ensure employer talent needs are met, • strengthening data sharing acres's agencies and with workforce partners to better understand education and employment outcomes and, • soliciting input relative to any uncovered areas that would benefit from consideration. By implication, the plan is both administratively and financially feasible. As proposed, it should have a positive impact on commonwealth of Pennsylvania residents. If we can in any way facilitate the development of support for this bold initiative, please do not hesitate to call on us. Response: We appreciate the comments in support of the plan. PA Workforce Development Association and County Commissioners Association of PA offered multiple comments together to include: • On behalf of our two statewide associations, we submit the following comments on Pennsylvania's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2016–2019. The comments represent the consensus of our respective memberships, which together will be responsible for ensuring successful implementation of many of the provisions in this plan. PA Workforce Development Association represents the commonwealth's local workforce development boards. County Commissioners Association of PA represents the commissioners of Pennsylvania's 67 counties. We are offering comments in three major areas of concern: o Training Benchmarks and Priority of Service o Performance Measures o Recognizing the Roles of State and Local Areas/Regions in the Plan The local system appreciates the opportunity to contribute to the commonwealth's workforce strategy for the next four years and offers our assistance toward successful implementation. Response: We appreciate the comments and look forward to working with the local boards and county commissioners. • The Commonwealth's local workforce development boards (LWDBs) and county commissioners support the Governor's goals and objectives as identified in the proposed state plan and agree that each local area and region should and will exert its utmost efforts to meet the Governor's agenda as described in the proposed state plan. With this underlying understanding, PWDA and CCAP respectfully submit that to achieve the Governor's objectives as set forth in the plan, consideration of incorporating the flexibility allowed and encouraged by WIOA into the plan will allow local areas and regions to be responsive to the differing needs of their job seeker and employer customers. To that end, comments are offered with respect to the three underlying areas identified below. Response: We appreciate the comment in support of the Governor's goals and objective and the willingness of each local area to exert its utmost efforts to meet the Governor's agenda. • Training Benchmarks/Priority of Service: It is recommended that additional clarification as described below be considered with respect to Title I training expenditure goals: o Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent, but it is not clear in the language of the plan. o Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA–funded program. We believe this to be the intent, but it is not clear in the language of the plan. o Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out–of–school youth minimum expenditure requirements are calculated. o Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures. o Include PELL, scholarships and other forms of financial aid to offset the Title I training target. o Include training conducted under other federal funding, including but not limited to American Apprenticeship, H1–B, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target. o Include one–stop partner program training expenditures for participants dual enrolled in the one–stop partner program and WIOA (e.g. Trade Act). We believe this to be the

intent, but a statement to that effect would make the section clearer. o Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. 9. Include the cost of registration, books, lab fees and required uniforms. • It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below: o Exclude dislocated workers from the calculation as their eligibility is not based upon barriers. o Include the local board definition of not earning a “self–sufficient” wage as one of the barriers. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We also note that administrative funds will not be included in calculating training expenditure benchmarks. • It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary qualifications, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or a stabilizing social service assistance. PA CareerLink® staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed. Response: The commonwealth encourages the provision of such services concurrently with participation in training services rather than prior to such participation whenever possible. • Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”: o Exclude dislocated workers as their eligibility is not based upon barriers. o Include those individuals who fit in the local board definition of not earning a “self–sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service. o Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons. o It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers. Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis. • Performance Measures: Pennsylvania’s 23 local areas are anxious to deliver and exceed the performance baselines that will be negotiated by the state and which are contained in the draft plan. Because states and local areas are still transitioning to WIOA, and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following: o The parameters for the calculation of the measures have not yet been issued by the U.S. Department of Labor and will not be issued until after the state plan is due. o There are 3 new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance. o There are 4 new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance. o The method for calculation of all the WIOA measures will not be the same as under previous legislation. o Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor will be working on how to improve reporting; however, as we enter into WIOA we are still working under the current reporting system. o The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State’s 15% portion of the grants

(WIOA § 116(f)). It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Recognizing the Roles of State and Local Areas/Regions in the Plan: The local workforce development boards and commissioners recognize and applaud the Governor's goals for the citizens, residents and employers of our great state. It is the intent of the local workforce development boards to exert our best efforts to make the Governor's goals a reality for the Commonwealth of Pennsylvania. In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget), and analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the state, by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. Aaron Schenk of PAPSA offered multiple comments to include: • Hello. My name is Aaron Shenck and I am the Executive Director of PAPSA, which is a statewide association in Pennsylvania that represents about 150 private postsecondary career and technical colleges and schools. Upon receiving the draft State Plan for WIOA, I sent a copy of the plan to our schools and asked for their feedback. Below is a summary of the primary comments I received back; On pages 197–198, the WIOA plan discusses the Benefit and Service Approval process for TAA funding. Several schools we represent have told me this process does not provide the eligible participant the best choice of program that would benefit them. The current process for this program has in the past denied an eligible participant the ability to enter into the training program that served their needs and their future employer's needs the best, simply because the program was not the "lowest cost" program within a large geographical radius. The quality of the program and whether it fit into the needs and choice of the participant and employers was traded away simply because it wasn't the perceived "lowest cost" program. There are even cases we know of where eligible participants decided not to attend job training because they could not attend the program they wanted and did not want to travel many miles away to another program that was not what they needed simply because that program was "lowest cost." Furthermore, the cost of the program is determined by the final sticker price of the program. However, most of these "lowest cost" programs are at public institutions that receive very significant public subsidies in order to provide that sticker price. The only reason why the sticker price of the program is "lowest" is because the government is already funding a sizeable share of the program. There are many private programs that are in reality a lower cost than many of the public options, if you factor out the other public dollars going into the public option to subsidize the sticker price of those schools. Thus, the "lowest cost" rule is forcing some eligible participants into a program that is not their first choice because the state thinks it is lowest cost, but then the state and local community have to add to that cost after TAA funds are provided. It is highly recommended this policy be changed and let the eligible participant choose the program that best meets their training needs. If the state does not make this change and wants to still focus on the final sticker price cost – regardless of what the eligible participant feels they need and regardless of the fact the state and community will have to subsidize additional dollars to this program – then why not offer an option for

the eligible participant to be awarded the amount of the lowest cost program and then allow them to use those funds to the program of their choice. By allowing this kind of cap in the cost and then allow the student to take those dollars to the program of their choice would better serve the interest of the eligible participant and the employment needs of the state, while still managing the costs of the TAA program. Response: Training Available at Reasonable Cost. The regulations at 20 CFR 617.22(a)(6) require that training be, among other things, at a reasonable cost. Further, approval requires that the training be at the lowest reasonable cost (20 CFR 617.22(b)). In particular, training at a facility outside the worker's normal commuting area, as determined under the state law (20 CFR 617.3(k)) that involves transportation (or subsistence) costs which add substantially to the total costs of training must not be approved if other appropriate training is available at a lower cost within the commuting area. When training substantially similar in quality, content and results, is offered at more than one training provider, only the lowest cost training may be approved (20 CFR 617.22(a)(6)(iii)(b)). A state must disapprove a training program if the training is in an occupational area which requires an extraordinarily high skill level and for which the total costs of the training are substantially higher than the costs of other training which is suitable for the worker (20 CFR 617.22(b)). Therefore, computation of a transportation payment is an important part of the determination of whether a particular training program is available at a reasonable cost. The 50 mile radius is a Labor & Industry decision based on an appropriate daily commuting distance. In the case where a participant decided not to attend any job training program, we take into consideration many variables and must adhere to the Trade Act of 1974, as amended, with our decisions. A participant has the right to appeal any decision that is made by Trade Act Services. USDOL provides L&I with federal funds in the form of a grant, and L&I executes Trade Master Agreements to disburse such grant monies with institutions for the provision of TAA training and services. Funds are not paid directly to participants. • On pages 171–172, the Perkins State Plan for the CTE Perkins Grant program, there is concern for the Evaluation and Performance Measurement Indicators used. In prior Perkins plans, some of the measures have been inaccurate in evaluating performance. Some of these indicators should be improved. For example, the indicators referring to nontraditional post–secondary student participation and completion uses numerical targets that are averaged across all CIP codes resulting in unrealistic performance targets. Response: Federal Perkins performance measures are mandated measures that have been developed and negotiated and agreed upon with USDE. These measures will not change unless Perkins V mandates different measures. • The final recommendation is anecdotal, but I have had several schools issue concern on the High Priority Occupation lists. They have indicated there are career fields that they know are in high–demand, but have not always made it onto the state or local High Priority Occupation lists. There is not a specific recommendation on how to improve this, but there is a general sense from some of the schools that the creation of these lists needs to be improved to better capture all the current high–demand career fields. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length for the petition approval. We also note that local areas can petition for the inclusion of occupations based on documented employer demand. Ajeenah Nuriddin–Little of Peirce College commented: How will the workforce system impact Perkins programming; specifically funding and the transition from secondary to post–secondary education? Response: Federal Perkins funds must support the mandated uses of funds. Though a combined plan is proposed, the federal Perkins recipients must still develop and offer Programs of Study. Therefore, students in the secondary CTE POS are still eligible for postsecondary college credit as they pursue the postsecondary POS. Craig Townsend of Penn Sheet Metal commented: I didn't have time to read every word. One segment that I believe should be included and possibly I missed it is Entrepreneurship. Training workers is great, they can take our investment in them to other states and they will. However educate people with the skills required to own, finance, plan, market, and operate their own businesses and now you have a winner. You have someone creating jobs, someone the state can continue to over tax, a for profit

company, someone who will provide the OJT, and someone who will remain and contribute the prosperity of the state. Training people to fit into a box is all good and the state needs that, this will be a challenge for education however I believe this program should also include practical education in the areas I mentioned to allow someone the create opportunities. Response: Pennsylvania has a number of Small Business Development Centers (SBDCs) across the commonwealth that are partners within the Partnerships for Regional Economic Performance. SBDCs regularly provide training and technical assistance to those interested in entrepreneurship. The plan requires LWDBs to meet targets for expenditures devoted to training. Entrepreneurship training is among the activities included as training for the purpose of this requirement. JoAnn Weinberger of the Pennsylvania Association for Adult Continuing Education offered multiple comments to include: • I am JoAnn Weinberger, Co–Chair of the Public Policy Committee of the PA Association for Adult Continuing Education (PAACE). PAACE is the association representing working professionals in the field of adult education in Pennsylvania, with over 400 members representing every region and services in every county. First, I would like to commend the Department of Labor and Industry for the open process used in the development of this draft state plan. The Committee structure and invitation for adult educators to join the discussions provided for the involvement of the field and their input is infused in this plan. The strong presence and value placed on adult basic education is encouraging, and the 70% requirement to serve those with priority of service: recipients of public assistance, other low income individuals and individuals who are basic skills deficient is notable. Recognition of Adult Basic Education as a “critical partner” (p. 37) provides acknowledgement and appreciation of the services included. And, the quality of the programs is demonstrated (p. 58) by Title II exceeding all negotiated performance targets annually since 2011–12. The collaborative effort that produced this plan needs to continue, and we recommend that a statement to that effect is placed in the plan. There are policies, guidance and/or program elements yet to be developed that can benefit from the continued invitation for adult educators to join the discussions. Although these areas do not need to be specified in this plan, strategically they must be developed within the initial implementation of WIOA State Plan. Specifically, the areas for inviting adult basic education providers to provide input include: Response: We appreciate the comments in support of the plan. It is important to note that while Labor & Industry led the facilitation of the State Plan submission, Title II was involved in every aspect of the plan development. As we implement the plan, Title II will remain a full partner in our efforts. • Provide integration and alignment of educational services including co–enrollment (p. 14, 29). This is key to the spirit of WIOA. On page 8, there is acknowledgement that “A key factor in accomplishing our five broad goals will be to boost interagency cooperation on workforce issues to achieve a team effort…and to amend it.” Although you have established a policy interagency workgroup of representatives from each department in addition to the State WDB, the reinstatement of the Adult Basic and Literacy Education Interagency Coordinating Council (ICC) as legislatively required by Act 42 of 1996, the Pennsylvania Adult Basic and Literacy Education Act, would provide an important vehicle for the development of the policies and guidelines yet to be developed, as its mandate is to coordinate existing adult basic and literacy education services provided by the departments of Education, Welfare (now Human Services), Labor and Industry, and Community and Economic Development. With representation from each department along with business/industry/unions, adult education providers, state legislators and others, this Council can provide a venue for brainstorming and discussion around key issues, including data integration and coordinating varied program services across departments. Although Aging is not a mandated partner, they came to the table with their educational efforts. Although this Council is now defunct, it could once again be used in support of the goals of the PA WIOA Combined State Plan, including “seeking discretionary grant funds…to serve those most in need.” (p. 33) The addition of recognition of the role of the ICC in boosting interagency cooperation would enhance this Draft State Combined Plan. Response: We appreciate the suggestion that reinstatement of the Adult Basic and Literacy Education Interagency Coordinating Council could provide an important vehicle for ongoing development of policies and guidelines. In addition, the commonwealth strongly supports

interagency collaboration. The commonwealth will review this suggestion regarding the ICC and determine how a reinvigorated council can best fulfill these goals. • Provide integrated education and training (p.12, 2.11 and p.50) which will require thoughtful consideration of partnerships and the networking needed for their development as well as requirements for implementation. Response: We appreciate the offer to provide input in support of policy and guidance for integrated education and training. • Develop career pathways that combine guidance, education, training and support services…with coaches that will help guide individuals…(p. 35). Career pathways with on ramps for the low skilled, with acknowledgement that developing literacy skills is not a short term process, need to be included. Title II programs include career coaches/case managers, limited by the funding available to provide those services. Local providers can recommend how to coordinate with CareerLinks and other case management provided through other programs so limited resources will be optimized. Adult basic education includes workforce preparation as does other programs, and again local providers can recommend how this will be coordinated. Response: We appreciate the offer to provide input in support of policy and guidance for coordination of services. • Support the efforts of "…the commonwealth conven[ing] panels of local representatives to assist LWDBs in interpreting and implementing this definition." (p.89 referring to the definition of basic skills deficient.) These local representatives should include Title II providers as they have the most experience with approved assessments and services. Response: We appreciate the suggestion to include Title II providers on the panels and agree it would be beneficial. • Expand access to online education and training programs that result in industry–recognized credentials (p. 11). In addition, the area of expanding access to online education programs should be included as a tool for distance learning and blended learning for those without a high school diploma or equivalency. Response: The commonwealth intends to explore options for distance learning for the provision of some adult basic education services. • Identify models and effective practices for out–of–school youth (p. 13, 3.1). The new requirement to use 75% of Title I Youth funds for out of school youth age is an area in which adult and family literacy professionals throughout PA can provide guidance. In 2014–15, OSY served by Title II were over 6,000 (to be exact, 6347). Recruitment, assessment, and services were provided and outcomes achieved. These OSY aged 16–24 represented every literacy level and were involved in career pathways. As the Department of L&I develops policies and guidance for the field, as you develop the "tools for low literacy," I encourage you to include adult education providers in your work. They can provide you with models for that are evidence–based. Furthermore, the Philadelphia Youth Network, the intermediary for the Title I Youth funds in Philadelphia, has direct and important experience in serving this age group. Their services to OSY without a high school credential include recruitment, assessment and programming that includes transitioning them to postsecondary or careers and can serve as a model for other Workforce Development Boards. Response: We appreciate the offer to assist in the development of policies and guidance in serving OSY. • Develop low–literacy tools and models for out of school youth who are basic skills deficient and far from proficiency in reading and math (p. 14–3.6). Research on adult literacy has already identified tools and models that can be adopted or adapted. Identification of tools needed should be included as well as the resources to implement the models and tools already available. Response: We agree with the comment and will alter the plan to indicate that the commonwealth will "leverage" tools and models. • Establish additional performance measures (p. 17, Goal 5). As these relate to adult basic education, the providers can provide key input. The number of outcomes per enrolled student (p. 57) has already been added. Response: If the Division of Adult Education decides to develop additional performance measures for adult education providers funded through the division, it will seek input from providers. • Establish additional services needed for immigrants (p 20, growing immigrant population) and those with less than a high school diploma (p. 23) in order to meet the Governor's goals. Response: We appreciate the comment and welcome suggestions of additional services for immigrants and those with less than a high school diploma that will assist in meeting the Governor's goals. • Clarify that areas for improvement (p. 29) should include, for bullets 3 and 4 Integration and alignment of education services and workforce programs, SNAP E&T with Title II

beyond the ABAWD for improved use of resources. Further actions to coordinate services through SNAP E&T (p. 43, bullet 2) refers to WIOA core programs, but could be enhanced to specifically mention Title II. The providers of Title II services are encouraged by the inclusion of this federal program and stand ready to assist in the development of the policies and guidelines for this coordination. Unfortunately, the description on page 189 which includes the educational components is not helpful in trying to determine how the current funds flow and the paperwork requirements. Furthermore, the community–based organizations could leverage their private funds for the 50–50 match that would add to the funding now available. Response: We appreciate your interest in finding the best ways to serve our clients. Some of the language was written more broadly to allow for flexibility in future programming. DHS is currently working on improving the methods for providing E&T services to SNAP clients and intends to engage in ongoing conversations with our community partners. DHS is also exploring potential ways to implement a 50–50 program in Pennsylvania. • Terminology throughout this plan is not always consistent. For example, on pages 8, 9, and 50 the term adult basic education is used, with the definition related to career pathways on page 8. Other terms used are low skilled adults on page 8, basic skills deficient on page 14, far from proficiency in reading and mathematics on page 14 and those who do not speak English on page 21. I know that some of this inconsistency is in the law and regulations. However, for this plan, it would be helpful to either have a set of definitions or provide for consistency. Response: We appreciate the comment and echo the commenter's point that the perceived inconsistencies are driven by federal law and regulations. • Operational Planning Elements (p. 33) recognizes state agency needs for professional development, but specific roles and opportunities for cross–agency collaboration need to be part of the professional development system for the providers in each agency represented by a core program AND combined programs. This professional development should be added to "Coordination, Alignment and Provision of Services to Individuals" (p. 46, paragraph 3). Response: We appreciate the comment and will add "provider staff" to sentence referenced on page 33. • In partnership with the State WDB, the commonwealth will conduct a comprehensive assessment of programs in other states that promote the formal integration of workforce programs (p. 33). PA adult education providers have colleagues in these states, and thus both in PA and those states providers should be included in the comprehensive assessment. For example, I am a national trainer for the Leadership Excellence Academy on Program Improvement in Texas and have direct contact with Program Directors. Response: The commonwealth will work with all plan partners to determine best practices in formal integration of workforce programs. • The description of Adult Basic Education (p. 37–38), case management (p. 46) and Title II (p. 101–107) are excellent as operational statements. This may have been the directions given; however, they would be enhanced by additional strategic/tactical statements. One example would be the inclusion of an explicit statement that it is a tremendous challenge to determine how best to invest meager resources given the magnitude of the state's literacy problem. It is stated early in the plan that a priority will be given to the "hardest to serve." If that is true, the system in general should be looking at employment on–ramps for low–literate adults using a stackable credentials model. This addition could be made at varied places in the Plan. Furthermore, the statement re case management in adult education (p. 45) is valid within the confines of limited resources, but an integrated case management system will require additional funds. Response: We appreciate the comment but feel the plan sufficiently addresses the issues noted as drafted. • Additional efforts described on p. 47–48, the next to the last bullet, should add the word "contextualized" to the basic skills instruction to support incumbent worker training. Response: We have accepted the suggestion and added the word "contextualized" to the item. • Adult basic education programs have a strong professional development system, distance learning program, and experiences that should be recognized in the alignment of programs. At the same time, there needs to be acknowledgement of the resources needed to form the required networking, collaborations, memorandum of understandings and contracts. Response: The commonwealth recognizes that resources will be needed to meet the collaboration and alignment goals of the plan and will explore options to support all of the core programs and PA CareerLink® partners to

implement these activities. • The use of the needs–based formula for Title II (p.64, p.102) will require further work and should be acknowledged in this Draft State Plan. This formula, developed in 2010 by a group of administrators, including me, took into consideration variables, including education levels and poverty in each county, with data from the American Community Survey and funding at that time, Now, six years later, additional data runs need to be examined to determine if the formula will need to tweaked and/or phased in and not adopted as is for the 2017–18 program year. Response: We thank you for your comment. However, PDE has reviewed the formula and feels that it is still appropriate. We will use updated data to populate the formula. The formula is used to determine the funding that will be available in each local workforce area and will be used for the competition. Therefore, it cannot be phased in. • Goal 2.1 (page 10) should be clarified as to whether the benchmarks refer to all three high priority areas, which includes low basic skills with the language “50% must be spent on low income individuals and individuals with other barriers to employment.” Is there a reason why low income is singled out when the law specifies all three high priority areas? Response: All three priority populations are included in the benchmarks as are individuals with other barriers to employment, such as ex–offenders, individuals with disabilities, and older individuals, amongst others. • Effective work with employers defined for Title II (p. 32). How will this be measured? Response: The performance measure "effectiveness in serving employers" has not yet been defined by the federal government. We expect the measure to be defined in final regulations, which are expected to be published later this year. • Ability to Benefit (p. 43, bullet 4) should include acknowledgement of the change in definition provided in the Omnibus Appropriations Bill that states that the 6th grade reading level is the base requirement. In the long term, education success beyond reading at the 6th grade level will be required and the career pathways need to demonstrate, beyond the entry point, where further education services are needed. Response: We appreciate the comment. • Input for Goal 5 (p. 17) can also be provided by PAACE directly. The Association annually provides return on investment data. Response: We appreciate the offer to provide return on investment data. • Priority of service is addressed directly and the requirement to spend 70% of the Title I funds on those in need of priority service, including those who are basic skills deficient addresses the critical need. The examples given on pages 68 and 69 are helpful; however, what is not addressed is what happens when there are 10 slots and 20 applicants who all have priority of service. Then, which of the three priorities takes precedent? How are decisions made? An example addressing this issue should be added. Response: Goal 2.9 addresses the order by which those in priority of service categories receive priority. In the event all were at the same level of priority, slots would generally be filled on a first–come, first–served basis. • The requirement for LWDBs and PA CareerLink centers (p. 69) to address methods they will use to apply the WIOA priority of service requirements is a welcome addition. Historically, potential participants who were basic skills deficient did not receive a priority of service. Title II partners can provide support for the recruitment phase (iii) and thus, “partners” should be added to the example. Response: We appreciate the comment in support of this addition. We will encourage LWDBs to utilize Title II partners in developing their priority of service strategies. Douglas Gibboney of the Pennsylvania Association of Goodwills offered multiple comments to include: • Since its founding in 1902, Goodwill Industries has believed in the "Power of Work" to strengthen individuals, families, and communities. The Pennsylvania Association of Goodwills (PAG) is made of eight independent affiliates who have 4200 employees including over 500 workforce development professionals who provide services to Pennsylvanians in need. Supported by private, public, and self–funded retail revenue sources, PAG affiliates served approximately 41,000 Pennsylvania residents in 2015. Several PAG affiliates have collaborated with private and public partners to address local workforce development needs. Through these experiences, PAG presents the following reflections and suggestions regarding the proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. The required shift of Title I funding to training will erode high–quality employment services delivered to people with barriers to employment. (WIOA Plan 2.1, p.10) Providing additional career training opportunities should be supported; however, the reduction in funding for direct employment services at the

CareerLink® will adversely impact the quality and quantity of services provided to Pennsylvanians with barriers. Simply put, it is the "human" in "human services" that makes the most impact. Many of the "barrier" populations cited in the plan require considerable face–to–face time to navigate complex public systems. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • The movement of CareerLink® services to an on–line format will result in service reductions to rural and barrier populations. (WIOA Plan Section I, p. 29) Central to transition of 50% of Title I funding to training is the belief that more core/intensive services can be provided through an online format. While PAG embraces technology as a method to address some workforce development needs, our experience has been that many people with barriers do not have basic technology skills. In addition to these issues, access to the required technology is not a given in every household. For example, many rural areas of Pennsylvania lack the broadband infrastructure that metropolitan areas take for granted. It is through the synergy of competent workforce professionals along with convenient physical access to technology that best addresses these capacity challenges. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. • An adult high school diploma option with an integrated career–based curriculum would best address the needs of the targeted barrier populations. Almost one million Pennsylvanians over the age of 24 lack a high school diploma despite having access to GED programs. While the GED option serves a segment of the ’dropout’ population, in isolation it does not provide ample opportunity to develop and practice important workplace skills. Dr. James Heckman, the Henry Schultz Distinguished Service Professor in Economics and one of the world’s leading figures in the study of human capital policy, has found that programs that encourage non–cognitive skills effectively promote long–term success for participants...His work has shown that GED recipients earn less than other high school dropouts with similar ability levels (University of Chicago Chronicle, January 2004)." PAG agrees that an integrated approach works best (WIOA Plan, Local Activities, p. 101). Several viable models exist including the Goodwill Excel Center model from Indianapolis and the Goodwill Helms Academy model operating in Philadelphia. At the core of each model is a focus on career development, managing through current and future barriers, and achieving a high school diploma as an interim step toward employment and post–secondary education. Unique approaches include on–site childcare, life skills coaching, and most importantly, ample opportunity to interact with staff who constantly reinforce workplace expectations, and concurrent credentialing in high–demand certificate credentials. Third–party research has substantiated these results as evidenced by the attached 2014 Ball State University study. Response: The commonwealth appreciates the suggestions. • As PAG–affiliate members, we greatly appreciate the opportunity to present our suggestions and experiences from serving our fellow Pennsylvania resident for nearly a century. We intend on working collaboratively with other private and public partners to address the emergent workforce development needs of Pennsylvania. We, like our founder Dr. Edgar Helms, remain dissatisfied until every person with a disability or disadvantage has an opportunity to develop to his/her fullest usefulness and enjoy a maximum of abundant living. Response: We appreciate the commitment and efforts of Goodwill Industries to provide opportunities and service to Pennsylvanians. Scott Heller of the Pennsylvania Association of Psychiatric Rehabilitation Services offered multiple comments to include: • PAPRS would like to thank Governor Wolf and his staff for the opportunity to comment on the PA WIOA draft plan. We applaud the extensive thought and obvious commitment that went into the development of this document; it provides a comprehensive plan by which Pennsylvania can support individuals with disabilities to purse their goals for employment and vocational success. PAPRS as an association of individuals and organizations from across PA dedicated to supporting individuals with psychiatric disabilities to have success and satisfaction in the areas of living, learning, working, and socializing; we have long been involved in supporting persons to regain recovery and community participation

thru work. It is based on our experience in supporting such individuals to gain, or regain meaningful employment, that we would like to offer the following comments on the draft WIOA. According to recent information, almost 80% of the 7 million individuals served in the public mental health system in this country are unemployed despite the vast majority of these individuals expressing the desire to work (NAMI Blog 7/14/14). In consideration of these numbers, we hope that the WIOA will seek to identify specific opportunities to serve and support this population seeking employment. Along these lines, we have some suggestions for the draft document: Response: We appreciate the comments. • Page 13– “The commonwealth will further support local efforts by ensuring that state agencies overseeing local and regional programs that focus on high–risk young people, including those who are in foster care and/or juvenile justice systems, are homeless, or are pregnant or parenting, will work together to build coordinated approaches that support local areas’ efforts to enroll and retain these young people…” Comment: consider including youth and young adults involved in the public mental health system. Response: We appreciate the comment and will add the suggested population to that statement. • Page 30– “Another key aspect of cross–program alignment is well–trained staff. The commonwealth will support improved and more frequent customer service and cross–program staff training to increase staff knowledge and allow for better service delivery.” Comment: identify and support cross–program alignment including training with mental health sources that promote pre–vocational and vocational services. Response: We appreciate the comment. • Page 115– State use contracting programs. “As noted above, OVR has a MOU with ODP and is in the discussion stage of updating it. The possibility of an Interagency Agreement with the Department of Human Services (DHS) is being investigated.” Comment: complete a similar MOU with OMHSAS Response: We appreciate the comment. We will consider developing a similar MOU with OMHSAS. • Page 121– “OVR and ODP are currently working on a coordination policy to enhance the employment outcomes for individuals with intellectual disabilities….The intended result is for a more seamless entry into employment for individuals with intellectual disabilities and for the coordination of extended services to allow individuals to maintain long–term employment. This is important because many of the supported employment services assist individuals with intellectual disabilities to gain, stabilize and maintain successful employment.” Comment: consider work on a similar coordination policy with OMHSAS Response: We appreciate the comment. We will consider developing a similar MOU with OMHSAS. • Page 128– Staff Development. “As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff. In order to ensure that OVR’s personnel receive significant knowledge from research and other state–of–the–art methodologies, OVR seeks out and provides presentations by university faculty experts in the field of rehabilitation, and statewide and nationally known speakers at in–service training programs. In addition, OVR coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.” Comment: consider technical assistance and training resources from expert sources in the field of rehabilitation and employment for individuals with significant mental health challenges. This includes both university based training as well as training and technical assistance from organizations representing those doing this work in the field of psychiatric rehabilitation, such as the Pennsylvania Association of Psychiatric Rehabilitation Services. Response: We appreciate the comment in support of this effort. OVR is committed to professional development and utilizes subject matter experts and available training opportunities from a variety of resources and providers. • Page 136– “Goal 1: Increase Employment Opportunities for Individuals with Disabilities o Expand the availability of apprenticeships, internships and on the job training (OJT) for individuals with disabilities. o Partner with the Bureau of Workforce Partnership and Operations (BWPO) to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities. o Create and expand interagency agreements between OVR and local Career and Technology

Centers and other community–based organizations." Comment: consider including those community–based organization using Evidenced Based Supported Employment practices applicable to the population served. Response: We appreciate the comment in support of this effort. OVR partners with community–based organizations and agencies that provide services for individuals with disabilities and will consider organizations using Evidenced Based Supported Employment practices. • Page 136– "Goal 2: Increase/Improve Transition Services for Students with Disabilities o Increase pre–employment transition services for students with disabilities. o Increase opportunities for students to gain workplace skills and community–integrated work experiences. o Enhance collaborative relationships with DHS, PDE and higher education. o Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind. o Research best practices for the implementation of peer mentoring opportunities." Comment: consider including in this section best practices in Supported Education. Response: We appreciate the comment and will include best practices in Supported Employment when implementing transition services for students with disabilities. • Page 158– Quality Standards: "OVR provides technical assistance and training for its staff through the use of seminars, conferences, and training programs. SE services provided by community based service CRPs are reviewed at least every 5 years to look at relevance and costs related to such services. Staff from Virginia Commonwealth University (VCU), OVR and the Pennsylvania Association of Rehabilitation Facilities (PARF) developed statewide standards for OVR and CRPs of SE services. These standards continue to guide all contracts and contract reviews for provision of SE services." Comment: consider adding Pennsylvania Association of Psychiatric Rehabilitation Services, Mental Health Association of PA, Mental Health Association of Southeastern PA, PA Peer Support Coalition, and other groups that represent specialized knowledge and resources for supporting individuals with mental health issues to fulfill vocational aspirations through application of effective educational and vocational supports. Response: We appreciate the comment. As OVR seeks comment on its proposed revision to its Supported Employment Policy in the spring of 2016, the agency will consider input on the various qualifications, credentials, certifications and specializations in Supported and Customized Employment available to effectively serve eligible individuals with the most significant disabilities. Susan M. Lichtenfels of the Pennsylvania Council of the Blind offered multiple comments to include:

• The Pennsylvania Council of the Blind is a grassroots advocacy organization made up of over 400 members across the Commonwealth who experience blindness or vision impairment. PCB gives a collective voice to these individuals on issues that impact their lives and the lives of all Pennsylvanian's with a vision loss. In this capacity, PCB would like to provide comment on Pennsylvania's Workforce Development Plan (FY 2016–FY 2019) as proposed. Accessible Software: On page 70, in the section entitled "Non–Discrimination and Accessibility," the narrative describes the various accessibility features of the one–stop operators and one–stop partners. While we applaud these centers for providing screen reader software such as JAWS and magnification software such as Zoomtext, there are two concerns we wish to raise. o While JAWS and Zoomtext are two of the more popular screen reader and screen magnification programs, not all patrons who are visually impaired know how to use these specific brands. Our recommendation in this regard is to add a second alternative for screen reading and magnification. One free alternative which is gaining more popularity is Non–Visual Desktop Access (NVDA). NVDA is an open–source screen reading software which can include a free add–on for screen magnification. o The narrative does not indicate with what regularity this software is being updated to insure maximum accessibility. Offering software that is woefully outdated limits the functionality of the user experience. If not already part of the ADA compliance recertification guidelines for the one–stop centers, PCB recommends that all accessibility software be up–to–date to pass recertification. Response: We appreciate the comment and proposed recommendations. To ensure meaningful access to all customers one–stop centers must be physically and programmatically accessible to all customers, including individuals with

disabilities. WIOA Section 188 Nondiscrimination and Equal Opportunity NPRM, 29 CFR Part 38 proposes to revise federal regulations to ensure access to the workforce system by people with disabilities by bringing the regulations in line with updated disabilities civil rights law and ADA compliance recertification guidelines for the one–stop centers. OVR supports PCB's recommendation that all accessibility software be up–to–date to pass recertification. Regarding the various accessibility features of the one–stop operators and one–stop partners, the Pennsylvania Council of the Blind (PCB) contends that while JAWS and Zoomtext are two of the more popular screen reader and screen magnification programs, not all patrons who are visually impaired know how to use these specific brands. OVR supports PCB's recommendation for PA CareerLink® to consider adding a second alternative for screen reading and magnification, such as Non–Visual Desktop Access (NVDA), a free alternative which is gaining more popularity and an open–source screen reading software which can include a free add–on for screen magnification. We will make local boards and PA CareerLink® centers aware of this resource. • Citizen Advisory Committees: On the section on Citizen Advisory Committees (CACs), as described on page 110, PCB appreciates the response of OVR to the recommendations. PCB strongly supports the actions indicated in these responses because in some districts the CACs are not meeting or if meeting receive very limited support from OVR. Response: We appreciate the comment in support of this effort. • Personnel Development: With regard to "Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development," which begins on page 122, there are a number of concerns relevant to people with vision loss that we wish to address. o Blind and visually impaired individuals rely on the instruction from Orientation and Mobility (O & M) professionals to travel to school, work, medical appointments, and daily living sites such as the grocery store, the bank, the pharmacy, the post office, etc. This training is absolutely vital to the safety and independence of people with vision loss. Based on the numbers provided, there are currently eleven positions held by O & M professionals and seven current vacancies. Of the eleven current employees, six are projected to retire within five years. These numbers are of grave concern. From the percentage perspective, currently 37 percent of the available O & M positions are vacant with 33 percent of the current staff due to retire within the next five years. We commend OVR for recognizing the importance of these professionals by waiving the state residency requirement and developing a paid internship program. But clearly, based on the numbers, OVR needs to develop even more strategies to recruit and hire these professionals and make this area of personnel development a higher priority. o Within the Bureau of Blindness and Visual Services, staff hired in the positions of orientation and Mobility Specialists and Vision Rehabilitation Therapists are required to have achieved both a Bachelor's degree and a practicum in their field. These professionals have met certain standards of knowledge, experience, and conduct in their given fields. Unfortunately though, what has become obvious to BBVS clients is that such standards are not a requirement to be hired as an independent contractor to teach/train clients on assistive technology. In many ways, the assistive technology skills taught to individuals who are vision impaired are as vital to daily living independence and employment success as the skills taught by these other two professionals. The Academy of Certification for Vision Rehabilitation and Education Professionals (ACVREP) is currently developing a certification program to insure that individuals teaching assistive technology meet basic standards. It is our recommendation that OVR review the ACVREP Certified Assistive Technology instructional Specialist (CATIS) proposed standards and establish its own basic standards for BBVS' AT instructors. Once OVR adopts such standards, all existing BBVS AT contractors should be re–evaluated to confirm they possess the minimum instructional, experiential, and knowledge requirements. All new AT consultants should be required to either meet these same standards or possess CATIS certification. o Through PCB member participation on the Citizen Advisory Committees, it has been observed that within OVR the hiring process takes, on average, three to four months to fill vacant positions. Vocational rehabilitation services for people with disabilities are in high demand as shown by the needs for priority of service classifications and the service waiting lists for clients already enrolled. In some cases, district offices are barely treading water to meet

client needs. Surely there is a way to decrease these long delays in filling vacancies; especially for the direct service provider positions. Response: We appreciate the comment in support of this effort and recognize OVR's need to improve. The State Civil Service Commission sets the minimum education and training (METs) requirements for O&M Specialist and Vision Rehabilitation Therapist positions. OVR acknowledges the civil service hiring process is slow and OVR works closely with L&I Human Resources to fill vacancies in a timely manner. Grant R. Gulibon of the Pennsylvania Farm Bureau offered multiple comments to include: • Pennsylvania Farm Bureau (PFB) is pleased to offer the following general comments on the Commonwealth's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan ("the Plan"). PFB is the Commonwealth's largest general farm organization, numbering more than 61,000 members. PFB and its 54 county organizations have provided legislative support, information, and services to Pennsylvania's farmers and rural families since 1950. A stable, skilled and legal workforce is critical to the future growth and development of Pennsylvania's agricultural economy. Given that agricultural employers have the most detailed knowledge of both the number of workers they will need, both now and in the coming years, and the types of the skills they expect those workers to possess, the Plan should make certain that such employers are duly represented on local workforce development boards (WDBs) and other relevant decision–making bodies. Pennsylvania agricultural employers already provide valuable input to the state Department of Agriculture (PDA) through their participation on various advisory committees, working groups, and other entities that develop farming–related policies, and their participation in workforce development activities can be just as helpful to the Commonwealth in achieving its economic development goals. Response: The PA Department of Agriculture (PDA) agrees with the Pennsylvania Farm Bureau (PFB) and appreciates its support of the items related to connecting agriculture and food suppliers to workforce development and agriculture education initiatives. PDA considers PFB an important partner in our outreach to the business community and counts on the involvement of PFB in our workforce development initiatives going forward. We also agree that it would be favorable for agricultural employers to be duly represented on LWDBs and on other relevant decision–making bodies, and they are encouraged to serve. • With regard to PDA, the Plan highlights its unique role in workforce development, including its recent addition of a special assistant focused on this area and the Secretary's participation with other cabinet members on the state WDB. Pages 41 through 43 of the Plan provide additional information about how PDA is working with other state agencies and private sector groups to provide rehabilitation, education, and training services to current and prospective farm workers, and continued support for its activities in this area should be encouraged. Response: We appreciate the encouragement from PFB in PDA's planned efforts to collaborate with other state agencies and private sector groups that serve other client populations. Our outreach to these populations broadens the base of people who engage the career pathways that lead to agriculture and food jobs. • Finally, we would recommend that the Plan focus on the benefits of apprenticeships, rather than simply job placement programs, as a method of developing a high–quality agricultural workforce. Page 43 of the Plan provides details on a PDA outreach effort to urban farming groups that led to discussion of, among other topics, the development of formal agricultural apprenticeship programs. In discussing the details of potential apprenticeship programs for agricultural workers, having the opportunity to use such programs to provide pathways for farm workers to ultimately attain technological, managerial and crew leadership positions should be the primary goal. Such an orientation will make these programs more attractive and precisely targeted than simply apprenticing a participant to a farm worker without additional opportunities for career development and advancement. At the same time, if there are opportunities for worker certification in certain skill areas, highlighting those opportunities would be beneficial. These positions need to provide a path to obtaining specific skills and motivation for workers to stay with the program. Response: PDA is actively involved in the development of three apprenticeships that lead to jobs in three of the in–demand occupations in the agriculture and food industry: agriculture equipment service technician, dairy herdsman, and organic farmer. We agree that apprenticeships will help us further define career pathways in a way that improves the content of

other education and training possibilities within the career pathway. The focus on on–the–job training in an apprenticeship makes it distinct from other forms of adult education. Gloria Haley of Pennsylvania NCBA offered multiple comments to include: • NCBA Pennsylvania would have three (3) recommendations to add to or amend the Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. The Pennsylvania Department of Aging (hereafter PDA) develop a partnership or assist the SCSEP programs in Philadelphia to develop a partnership with the Driver Training and Certification Department of the School District of Philadelphia to provide initial training for SCSEP participants interested in acquiring a Pennsylvania School Bus Endorsement. Participants acquiring such an endorsement would also need to obtain a Pennsylvania commercial driver's license. To assist our participants in acquiring a commercial driver's license, perhaps PDA can help arrange for classes to prepare for the knowledge portion of the tests be given at the local One Stop or Career link centers in Philadelphia. This recommendation is in response to the 643 annual openings in the School and Employee Bus Transportation job classification in Pennsylvania and the statement that older workers would be a good fit for these jobs. Response: PDA will contact PennDOT to explore the availability of classes to prepare individuals for the knowledge portion of the test for a Commercial's Driver's License as well as possible locations to administer the test. PDA will also contact its SCSEP subcontractor in Philadelphia to discuss the feasibility of further exploring this recommendation with all four SCSEP providers in Philadelphia. • The PDA assist the SCSEP sub–grantees to lobby to have the lack of computer literacy listed a Priority of Service category under Federal regulatory priorities of service. It can be reasonably presumed that the occupations in the commonwealth that require Short–Term On–the Job training (ST OJT), or Moderate–Term On–the Job Training (MT OJT), and High Priority Occupations (HPO's) all require increasing degrees of computer literacy. Both minority groups and seniors are statistically on the wrong side of the digital divide and require remedial efforts to bridge it. Naming lack of computer literacy as a priority of service category will bring focus and resources to bear to bridge the digital divide. Response: The Priority of Service categories are set by federal law. PDA cannot change what is written into the law and clarified through regulation in the final rule. However, it should be noted that lack of computer literacy is assumed under the low employment prospects service priority. • The PDA should increase the frequency of both online and in person meetings to coordinate SCSEP sub–grantees with the job training initiatives available locally and throughout Pennsylvania. Presumably, more frequent contact can encourage more partnerships between SCSEP sub–grantees and organizations providing training for our participants. Response: PDA will convene periodic conference calls in FY 16–17 with all national SCSEP providers operating in PA to discuss local job training initiatives and other local best practices related to participant recruitment, CareerLINKS, host agency development, meeting performance measures, etc. W. Michael Nailor of the Pennsylvania School Librarians Association commented: The Pennsylvania School Librarians Association (PSLA) represents nearly 900 teacher–librarians and school library educators around the Commonwealth. We applaud and endorse the thrust of the strategies found in the proposed WIOA Combined State Plan as posted on December 28, 2015. We ask that you consider the role of school libraries serving Pennsylvania's students and teachers as you transform this plan into effective programming to ready all in Pennsylvania for the workforce. Pennsylvania's expressed goal to expand "the number of 'schools that teach' the skills necessary to succeed in college and careers" (p. 7) can be facilitated by the access to information and the information literacy skills to use that information that are provided in the 21st–century school library program. A McKinsey study predicts that by 2018, the U.S. could face a shortage of 140,000 to 190,000 "people with deep analytic skills" able to access and use information. The faculty member at schools in our state who has the greatest investment in this information literacy process of accessing and using information is the teacher–librarian. Unfortunately, as Governor Wolf indicated in last year's budget message, recent budget cuts to Pennsylvania school districts have "left 56 percent of Pennsylvania students with no access to a full–time librarian" exactly at the time when quality school library programs and resources are needed more than ever to prepare Pennsylvanians for the workforce. Increasing "opportunities for all youth

to participate in work based learning through summer employment, pre–apprenticeship, apprenticeship, internships and other similar experiences" (p. 8) is an important goal – but can we send these students into field–based education experiences without access to quality information and the ability to analyze and use it? Modern knowledge management tools require workers to read, analyze and make good decisions about how to use that information. Solid school library programs offer students this kind of education from pre–school to graduation. Information literacy – the ability to access and use information – is mission–critical to workforce development because it is the basis for wise decision–making and communication. It is more than, and should not be included in, the "soft skills" and "micro–credentials" mentioned in sub–goals 1.4, 1.9, and 2.6. The access and the appropriate use of information as taught in quality school library programs are critical thinking skills and macro–credentials. Including them in the document could assist in making this WIOA plan into a reality. Response: We appreciate your comments about the role that school librarians play in developing a workforce that is information–literate and able to think critically. Laura Saccente of the Pennsylvania Statewide Afterschool/Youth Development Network (PSAYDN) offered multiple comments to include: • Formed in 2004, Pennsylvania Statewide Afterschool/Youth Development Network (PSAYDN) operates out of the Center for Schools and Communities (CSC) in Camp Hill, Pennsylvania. As a division of the Central Susquehanna Intermediate Unit (CSIU), a local education agency, since 1988, the CSC has been committed to improving outcomes for children and families through training, technical assistance, program evaluation, research and resource development. PSAYDN's mission is to promote sustainable, high–quality out–of–school time youth development programs through advocacy and capacity building to enhance the welfare of Pennsylvania's children, youth and families. Pennsylvania is one of 50 states that are part of the Charles Stewart Mott Foundation's funding of statewide afterschool networks. PSAYDN works on various levels in Pennsylvania to provide the following supports for out–of–school (OST) programs: connecting stakeholders with strong local and state leaders to increase awareness and build support for affordable, quality afterschool programs; creating opportunities for collaboration through statewide, regional and local partnerships; and changing lives by helping Pennsylvania afterschool programs stay focused on high quality services. According to the U.S. Bureau of Labor Statistics, it is estimated that by the year 2018, Pennsylvania will have over 300,000 jobs that will relate to STEM fields—over 50 percent that will need some level of post–secondary education. Recognizing these trends, PSAYDN implemented Project Accelerate, a program designed to strengthen systems building of high quality OST Science Technology Engineering & Math programming. STEM education in OST programs can increase both interest in and aptitude for STEM fields and have positive impacts on students and Pennsylvania communities well into the future. OSTs offer structured learning environments outside the traditional school day, through before– and after–school; summer; and extended–day programs. They provide a range of enrichment and learning activities in various subjects including arts; civic engagement; STEM and 21st century skills, such as critical thinking and literacy information. OSTs offer intentional academic support, mentoring and more. High–quality OSTs often engage participants through innovative, promising practices and diverse learning methods that complement what students learn during the school day. Each year, students spend approximately 20 percent of their waking hours in school and approximately 80 percent outside of school (National Center for Education Statistics). OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities. Response: The commonwealth appreciates the contribution which OST programs in general and PSAYDN in particular make to high quality programming for youth. In addition the commonwealth agrees that high quality OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities. It is important to note, however, that OSTs are primarily funded through education funding. WIOA funding is targeted to workforce development, specifically to individuals who face barriers to employment. WIOA funding does not include funding for general education programs. • PSAYDN is grateful for the opportunity to provide commentary for the Workforce Innovation and Opportunity

Act's (WIOA) four–year state plan that outlines Pennsylvania workforce development strategy. PSAYDN strongly believes that OST programs involving partnerships with workforce development boards (WBDs), businesses, government, and private and community–based organizations enable K–12 students to explore post–secondary opportunities and build strong portfolios that align with workforce needs. OST offers activities that contribute to workforce development such as career interest inventories, career awareness, career exploration, mentoring, internships, and even career certifications, like badging, in high–demand fields. PSAYDN is pleased to see the commonwealth continuing to encourage Business–Education partnerships (bullet 4.6, page 17, 87) and recommends the connection of local businesses to OST programs. Response: We appreciate the comment in support of Business–Education partnerships and agree that local businesses should be encouraged to connect to OST programs. • Ongoing research has also demonstrated that participation in high–quality OST programs yields positive academic outcomes. OST programs help reinforce literacy and mathematics for students who are struggling by providing extra time and differentiated methods of instruction, such as project–based learning activities, to keep students engaged in school while building skills and progressing toward graduation, college, and the workplace. PSAYDN recommends that the state plan add to bullet 2.8 (p. 11) the informal education system as a potential partner. Specifically, OST programs can assist with several of Pennsylvania's broad goals for the commonwealth's workforce development system, like "establishing career pathways, increasing opportunities for youth and engaging employers through workforce partnerships. High schools are increasingly focused on ramping up student performance in basic academic skills—certainly a laudable goal. Many schools are not able, however, to provide opportunities during the school day for all students to learn about college and career options or to develop vital 21st century skills. Students from higher socioeconomic backgrounds can more easily access learning opportunities through networks of family, friends, and other options, but economically disadvantaged youth often have little access to these opportunities and services. Afterschool and summer learning programs can help the Commonwealth meet this goal. Response: The commonwealth appreciates the contribution which OST programs in general and PSAYDN in particular make to high quality programming for youth. In addition the commonwealth agrees that high quality OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities. It is important to note, however, that OSTs are primarily funded through education funding. WIOA funding is targeted to workforce development, specifically to individuals who face barriers to employment. WIOA funding does not include funding for general education programs. • PSAYDN notes that WIOA no longer requires a Youth Council. These strategic planning entities are critical to directly link youth stakeholders and experts to decision making about funding and resource allocation, service implementation, performance measures, and reporting—ensuring out–of–school youth and low–income, in–school youth are adequately served across systems according to WIOA's intent. PSAYDN is pleased to see that a specific initiative to support youth in the guidelines is the Youth Committee within the State WBD (bullet 3.3, p. 14) and local WBDs (p. 85). PSAYDN welcomes up opportunity to assist the Youth Committee by designating OST partners to help advise on programs and policy. PSAYDN recommends the Department of Labor and Industry provide funding and technical assistance to local WDBs and its partners on how to leverage WIOA resources and build a comprehensive youth system that effectively serves vulnerable youth. Response: We appreciate the offer to advise on youth policy. The commonwealth offers technical assistance to LWDBs upon request. • As part of WIOA local unified/combined planning, PSAYDN recommends boards initiate the move from career pathways as special programs to career pathways as the workforce development system's new way of doing business. One of the key changes in the Every Student Succeeds Act, signed by President Obama in December, is the requirement that state plans must include collaboration with a number of other departments and programs. Some of these include the Perkins Career and Technical Education Act, the Workforce Innovation and Opportunity Act (WIOA), and the Adult Education and Family Literacy Act (AEFLA). This represents an important change from

NCLB where state Education departments typically operated more independently in developing state plans. PSAYDN recommends a clear vision in the state plan on the collaboration with the various state agencies for successful career pathway models from Pre–K through college/career. Response: The commonwealth appreciates the comment and the reference to state plans and will work to include this strategy in the planning and development of the state plan required under ESSA. • Included in Title IV of ESSA is the “21st Century Schools” section, where funding is available for career and college readiness programs/services to be coordinated between schools and with community–based services and programs. These projects may be partnerships with higher education institutions, business, nonprofits, community–based organizations, or other public or private entities, including workforce development boards. As WIOA youth programs are shifting toward a focus on out–of–school youth, the 21st Century Schools funding may give workforce development boards additional opportunities to collaborate and leverage resources for in–school youth services that WBDs deem to be important to maintain. Response: We appreciate the suggestion and will encourage local workforce development boards to consider these resources. • Generally, PSAYDN recommends competitive grant opportunities, when appropriate, be open to OST/informal learning entities to assist with regional economic development strategies. Response: The commonwealth recognizes the value of the work done by the commenter and other OST programs. It is noted however, that WIOA funds are generally directed to out of school youth rather than the larger population of students who participate in OST programs. Other competitive grants may become available that are more suitable for OST programs and do not have WIOA’s legal restrictions. • These recommendations and examples make clear that afterschool and summer learning programs can develop strong partnerships with workforce development boards, K–16 education institutions, employers, museums, and community–based and youth–serving organizations in order to create stronger connections to college and careers. Given their prevalence in communities across Pennsylvania and their ability to be flexible and responsive to community needs, afterschool and summer learning programs are well positioned to provide youth, particularly underserved youth, with opportunities to be college and career ready. PSAYDN looks forward to the ongoing process and opportunities to partner with workforce development boards. Response: The commonwealth appreciates the value of the after school and summer time programs and the contribution such programs make to helping students be college and career ready. Jeff Iseman of the Pennsylvania Statewide Independent Living Council offered multiple comments to include: • CILs–We appreciate the L&I OVR comments to expand its’ work with the Centers for Independent Living (CILs) in additional areas, particularly increasing community employment (particularly with youth), addressing ADA compliance in PA Career Links and grant opportunities. CILs are open to additional opportunities in working with L&I to further promote Independent Living (IL). Response: We agree that the CILs are a valuable partner and will include the CILs in the section on partner programs. • Career Links and ADA Compliance– PA SILC appreciates the efforts made to contract with CILs to address this issue. The accessibility regarding Career Links has been ongoing issue. Advocates just last year celebrated the 25th anniversary of the Americans with Disabilities (ADA). Our understanding is that all programs and services under WIOA offered by L&I are to be both physically and programmatically accessible. We recommend that L&I redouble their efforts make all PA Career Links accessible by the end of this plan. Response: We appreciate the comment and support the requirement under Section 188 for all PA CareerLink® centers to be physically and programmatically accessible for all job seekers, including individuals with disabilities. • L&I OVR and Community Health Choices (CHC) – Most consumers who currently and would receive physical disabilities services through PA Department of Human Service (DHS) Office of Long Term Living (OLTL) –with the exception of Act 150 consumers and a few other target populations– will be receiving services through a managed long term care system, also known as Community Health Choices (CHC). We ask that the PA L&I WIOA plan put forth specific proposals on how this will work between OVR and DHS OLTL. PennDOT is also to have a role here. Managed Care Organizations (MCOs) will have a role in supporting and employing people with disabilities, so it’s important that

there is strong collaboration between OVR, DHS OLTL, PennDOT, MCOs and the disability community. Response: DHS is currently developing requirements for its CHC initiative and increasing competitive integrated employment outcomes for CHC participants is a priority for DHS. • Increase involvement of L&I stakeholder groups in the process of policy making prior to putting forth proposals– There is commentary here on the roles of Pennsylvania Rehabilitation Council (PaRHC), State OVR Board and to a lesser degree, PASILC. While updates are certainly appreciated by all stakeholder groups, it is too often that policies and budget matters are already decided prior to sharing the information. We ask for each of these organizations to be included in the inception of programs and policies as well as being provided greater opportunities up front for comments of possible changes to existing L&I policies and budget matters where possible. Response: We appreciate the comment and encourage stakeholder collaboration and communication. • Strongly increase efforts to address transportation gaps both through L&I and cross agency efforts– In 2013, Pennsylvania passed Act 89, which addressed funding for all modes of transportation. In 2015, the US Congress and President Obama passed the Fixing America's Surface Transportation (FAST) Act. While these do not address all transportation needs, both provide additional resources not previously available. In addition, Pennsylvania is moving toward a managed long term care system (CHC) which should save funds and where MCOs will have a role in supporting individual transportation. We ask that L&I strongly collaborate with Pennsylvania Department of Transportation (PennDOT), DHS and MCOs where possible to increase employment opportunities. Since more individuals will be paying taxes at all levels of government, this would be a win –win for all stakeholders involved. This should include efforts to increase accessible transportation options and support in all venues. Lack of accessible transportation is an issue that we hear about in all regions of PA. It is particularly a challenge in areas where para–transit providers don't cross county lines (although this is supposedly being addressed in Act 89 as we speak) and providing transportation during non–traditional hours (evenings, weekends, and holidays) when people need to work. The majority of PA's high speed rail stops (Amtrak, Southeast Pennsylvania Transportation Authority (SEPTA) and Port Authority Transit (PAT–Allegheny) aren't accessible, but efforts are slowly being made to address this issue prior to and now through both Act 89 along with the new federal funding in the FAST Act. There are also efforts to increase the amount of accessible taxis and Transportation Networking Companies (TNCs–Uber, Lyft) which could also provide additional transportation options. Response: We appreciate the comment and support efforts to address transportation gaps. • Strengthen the role and include people with disabilities in all of Pennsylvania's Workforce Investment Boards (WIBs)– Too often, we hear that people with disabilities are not provided a seat at the table for regional WIBs. Since the employment rates of people with disability rates are lower than any other population, we suggest that every WIB have at least one person with a disability who has been a user of OVR services or an individual who has worked in disability employment services. Response: We appreciate the comment, but note that local elected officials make appointments to LWDBs. • Include additional support efforts in all career paths for people with disabilities– While there have been improvements in recent years, there is still too much tunnel vision in terms providing greater employment opportunities for people with disabilities in all fields. There are efforts to increase employment in Science Technology Engineering and Math (STEM) and through PA Project Search sites (healthcare focus). We would like to see additional community and traditional colleges, universities and trade schools are included in disability partnerships. For employment, we would suggest additional collaborations with Geisinger, Allegheny Health Network, Highmark / Blue Cross organizations (both statewide and regional) and other community health systems that do not current partner with OVR. Response: We appreciate the comment and promote efforts to increase employment in STEM careers. • Earlier and stronger inclusion of PA Department of Education (PDE) and greater inclusion of all public and private schools across PA in working with OVR, including greater inclusion efforts– There seems to be an inconsistency in the role of PDE and local schools (both public and private) in terms of addressing career opportunities. WIOA has called for increased collaboration between OVR, PDE and disability stakeholders to address youth with

disabilities in school and out of the education system. The Governor has made it a priority to increase investment in both education and OVR. We believe that greater efforts need to occur on the local levels for successful partnerships, including, but not limited to greater inclusion efforts. Combined with the additional resources noted for the various plans, increased inclusion opportunities would help to inspire more people with disabilities to reach for greater career opportunities and increase independence. Response: We appreciate the comment and support continued collaboration and partnership between OVR and PDE. • Increasing awareness of OVR resources and support for Veterans with disabilities– OVR did a Memorandum Of Understanding (MOU) with the Federal Veterans Administration (VA). While it appears that more has been done and PA Career Links have a PT or FT staff providing veterans supports on a regular basis, awareness with veterans of OVR services could still be improved thorough increase outreach with veterans' organizations and local governmental agencies supporting veterans. Some CILs have also hired veterans with disabilities. We would encourage your local OVR and Career Links to reach out to them for collaborative efforts. Response: We appreciate the comment in support of this effort. • Employment First– We applaud OVR's efforts on employment first, but ask that greater efforts are made up front to include the disability community and stakeholder organizations in the development of Employment First. Response: We appreciate the comment and will engage stakeholders as we implement Employment First. • Increased Disability Hiring (Reforms to State Civil Service Commission (SCSC) and Office of Administration (OA)– We applaud efforts here but ask that you collaborate with the disability community and stakeholder organizations in changing policies and practices that have made it difficult for people with disabilities to obtain employment opportunities with the state of Pennsylvania. We would also ask that a preferential hiring system be developed for people with disabilities similar to that already in place for veterans. An expedited employment policy would make great strides in lowering the abysmal unemployment rate of people with disabilities. Response: We appreciate the comment in support of this effort and suggestions to improve current efforts. • Additional Funding for OVR– We commend the Governor and Legislature in supporting state additional funds to draw down the federal match. This needs to be done on an annual basis to address both OVR system capacity and disability employment needs, particularly with the move away from segregated and sheltered employment settings as required by WIOA. Response: We appreciate the comment in support of this effort. • Increased involvement with OLTL– There has been recent efforts to increase the partnerships between OVR and OLTL. We commend these efforts and ask for them to continue and expand, for both the current Home & Community Based Services (HCBS) and future CHC systems. Response: We appreciate the comment. • Additional partnerships with OVR, state and local PA Chambers of Commerce (COC), National Federation of Business (NFIB) and disability stakeholders– We acknowledge that some partnerships exist with some COCs, OVR and local/ state disability stakeholders, but more is needed. Greater partnerships could help the private sector to fill more of open positions with people with disabilities seeking employment. Response: We appreciate the comment on the importance of partnership and business engagement. As part of DCED's business engagement plan, OVR information will be distributed. • Greater support and collaboration for Deaf–Blind Population– In PA SILC's current State Plan for Independent Living (SPIL), we have a grant in collaboration with OVR and the CIL of Central PA as a pilot to provide some greatly needed supports and services for the Deaf–Blind population. While this effort has provided a great start, much more is needed. We encourage increased financial support through L&I OVR, DHS, PennDOT, MCOs and other stakeholders to increase ongoing and sustainable services and supports for the Deaf–Blind population that would reach all areas of Pennsylvania. Response: DHS is aware of the current demonstration program being undertaken by OVR with its partners to provide Supportive Services to Pennsylvania's deaf–blind population. DHS is willing to discuss the results/findings of the demonstration project with OVR when the time comes to determine whether and how DHS could support this population to remain independent in the community. • Increased support for minority or diverse disability populations– In PA, we continue to see growth in minority populations, particularly Hispanic and Asian communities in Central and

Eastern PA. We support additional resources, including bi–lingual staff to address populations where English as a Second Language (ESL) is an issue. We also have large Amish populations, scattered in various regions of PA who could benefit from OVR services. CILs could be helpful here, as a number do outreach to these populations. We would also support the idea of deeming the disability community a minority in terms of employment status rather than that of just a targeted group. Response: We appreciate the comment. • Sustainable rates to Supportive Employment (SE) and other employment programs– Rates is an issue for any provider of services, including CILs and other disability organizations. OVR's rates on Supportive Employment are much lower than rates for employment supports available through DHS ODP. We ask for greater parity and increased rates to promote sustainable employment supports, including, but not limited to SE. Response: We appreciate the comment. OVR is currently revising its Supported Employment Policy and investigating the agency's rates for employment supports and how they compare to those available through DHS ODP which are much higher than our resource capacities. Notwithstanding the rate amount, we agree that, where feasible and appropriate, DHS and OVR's supported employment service definitions and approaches to reimbursements should be aligned. • Greater Flexibility regarding educational and experience in addressing OVR staffing needs– We understand that there have to be minimum requirements to meet federal and that PA has additional requirements for OVR Counselors. We ask that OVR consider additional degrees, vocational background and life experiences in addressing its staffing needs, including, but not limited to counselors. Response: We appreciate the comment, but do not agree with the recommendation. Both the statute and the proposed regulations maintain the language about the establishment and maintenance of personnel standards that are consistent with any national or state approved or recognized certification, licensing, registration, or other comparable requirements that apply to a particular profession. OVR contends that the new language contained in the 2014 Amendments regarding the education and experience requirements that would allow for the attainment of a baccalaureate degree plus one year of relevant job experience do not apply to the category of vocational rehabilitation counselor. This is based on the acknowledged fact that a national certification exists for this profession (Certified Rehabilitation Counselor), and that many states like Pennsylvania have counselor licensure laws. Both the national certification and state licensure laws require a Master's degree as the minimum qualification for a vocational rehabilitation counselor. • Support for Assistive Technology (AT)– We support L&I OVR addressing the AT needs of individuals in Pennsylvania. Response: We appreciate the comment. • Addressing Home Modifications and the need for a consistent policy– It is our understanding that home modifications are available to individuals to maintain community based employment (both in the community and for home based business). We ask for support, clarification and greater collaboration efforts to meet this need to increase community employment. Response: We appreciate the comment. OVR must apply the current policy as written. Per OVR policy number 13–200.03, work and home site modifications are services that should enable individuals to achieve a competitive integrated employment outcome. OVR's work and home site modification policy and guidelines are designed to assist the counselor and customer to jointly determine when sponsorship of this service is appropriate. OVR is obliged by law and regulation to provide only those disability–related modifications that are (1) necessary for successful completion of the consumer's rehabilitation program, and (2) performed in the most cost–effective way possible. • Employment Discrimination– We support efforts to address employment discrimination as it relates to the disability community and ask for increased efforts to raise awareness of existing resources. We hear it's difficult for individuals to understand which governmental agencies to turn to for obtaining help here. Response: We appreciate the comment and note that complaints can be filed with the Pennsylvania Human Relations Commission. • Continue and increase social media presence– We support OVR's efforts into social media and encourage additional efforts where possible, particularly to increase awareness of employment resources. Response: We appreciate the comment. • Transition and training of individuals coming out of the Correctional System– It is estimated that at least 20% of individuals incarcerated in

correctional facilities on a long term basis have some sort of disability. We appreciate efforts in helping these individuals to transition back into the community where possible and ask that you look to CILs as a community resource here. Response: We appreciate the comment in support of the plan. Kristin Ahrens of Person–Driven Services and Supports Coalition offered multiple comments to include: • The Person Driven Services and Supports (PDSS) Coalition is made up of people with disabilities, family members and 50 organizations including: Disability Rights Network of PA, PA Developmental Disabilities Council, the Institute on Disabilities at Temple University; PA Health Law Project; PA Mental Health Consumers Association; Center for Independent Living of Central PA; Mental Health Association of Southeastern PA; Values into Action–PA, Mental Health Association in PA, National Alliance on Mental Illness of SW PA, Acquired Brain Injury Network of PA, The Arc of PA, PA Statewide Independent Living Council, and Self–Advocates United as 1. We respectfully submit the following recommendations to the Department in relation to the WIOA Combined State Plan. In Pennsylvania over 12,000 adults with disabilities of working age self–direct at least one of their home and community based services. Some of these self–directed services are supporting people to find or maintain jobs. The PDSS Coalition urges the Department to (1) consider adding a self–directed option for services through OVR and (2) consider investing in training for peer services which will expand employment opportunities for adults with disabilities. Response: We appreciate the comments and recommendations. • Recommendation 1: OVR should provide a self–directed or “person–driven” option for people to receive their Individualized Plan for Employment (IPE) services and supports. Self–directed or person–driven models of service can not only improve quality of life and leave people with fewer unmet needs, but can also save money : Instead of “packages of service” designed by the system, (even if a person doesn’t need that level of support), people can blend paid and unpaid services and buy just the support they need. o The person takes on many of the responsibilities otherwise performed by agency staff, so costs can be lower. o If offered flexibility with funding, people can have the option to purchase generic services and supports which can replace sometimes costly and unnecessary special services. An example would be someone paying a neighbor for mileage to drive them to work instead of hiring a specialized transportation service. Another example is small woman needing a cushion for her wheelchair. Instead of obtaining 3 bids for a specialized cushion, the woman could purchase a non–specialized cushion from a department store which would work well in her situation and save money. o In person–driven services, people can use informal supports, like friends, co–workers, family or neighbors. This can help with the shortage of traditional providers and offers cost–saving opportunities. Through its participant–directed supports option, the Office of Developmental Programs currently allows people to directly hire and manage job developers and/or job coaches. This option allows people flexibility and cost–savings of a minimum of $43/hr of service. In this model (as long as the employer supported this arrangement) a co–worker who is not on shift could provide job coaching to a person with a disability. This type of arrangement not only saves money but offers a more natural supportive arrangement on the job for the person with a disability. For some people with disabilities, once OVR funded support concludes, a home and community–based waiver picks up the cost of job support. If OVR were to allow for people to self–direct and directly hire and manage their job supports, there could also be more fluid transitions to these waiver funded support for people who require long–term job support. In terms of the infrastructure necessary for the mechanics of a self–directed option, the Commonwealth holds contracts with multiple providers of financial management services that act as a payroll and billing agent on behalf of the state as well as ensuring that worker qualifications are met and workers compensation coverage is provided. Response: OVR provides every opportunity for an eligible customer to make informed choices about their vocational goals and services they receive. DHS believes self–directed models are very good models that promote independence and self–determination. OVR promotes the use of natural supports and continues to explore how they can be best developed and implemented. • Recommendation 2: Peer support services, by their very nature, create employment opportunities for adults with disabilities. OVR should support capacity building efforts for peer provided support services. Not only do peer support services provide

employment opportunities, but also there are some health advantages for people engaged in these models. Research shows that some of the advantages to peer support included increases in physical activity, medication adherence, and the largest increase in reported physical health related quality of life. In the past OVR funded an advanced training for certified peer specialists (CPS) which essentially created a cohort of CPSs that were specially trained to support people with intellectual and developmental disabilities (I/DD) in their wellness and recovery. There is a tremendous need for CPS for people with I/DD and developing a pool of people available to offer this service offers greater employment opportunities for adults with disabilities. Without the OVR funding, this specialty training has not continued. We urge the Department to provide funding to train new cohorts of CPS trained in supporting people with I/DD and co–occurring mental illness. Response: OVR continues to provide funding to support eligible individuals with disabilities in Certified Peer Specialist (CPS) Training. OVR representatives continue to support efforts to develop additional CPS training models to serve specific populations including individuals with I/DD and youth. OVR continues to counsel eligible individuals with disabilities who may be interested in work as a CPS on this type of opportunity. • Additionally, another peer service model that is available through home and community–based waivers is a “Supports Brokering Service.” Unfortunately, there are very few providers of this service. Currently a number of the active supports brokers are either people with disabilities or family members of people with disabilities. The PDSS Coalition believes with some outreach and availability of training in Supports Brokering, this could be a great employment opportunity for adults with disabilities. Again, we urge the Department to provide funding to recruit and train adults with disabilities as Supports Brokers. Thank you for the opportunity to provide input regarding the WIOA Combined State Plan. Members of the Person–Driven Services and Supports Coalition would welcome the opportunity to discuss our recommendations with the Department. We would also be happy to answer any questions or provide additional information. Response: As OVR continues to develop its collaborative relationship with DHS/ODP/BAS/OLTL, the agency will continue to explore and consider various service delivery models, employment opportunities and training options that will improve competitive, integrated employment outcomes for individuals with the most significant disabilities. Philadelphia Works offered multiple comments to include: • We are pleased to submit the enclosed feedback to the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. The Commonwealth has clearly gone to great lengths to develop and identify workforce goals for Pennsylvania that provide many core strategies for workforce areas across the state and we thank you and your partner agencies for such incredible dedication. We appreciate the depth and breadth of thought and input devoted to establishing the five broad goals and agree that they are essential to developing an effective statewide system. In general, we believe the state plan offers tremendous opportunity for the Commonwealth to achieve at unprecedented levels. We also appreciate the Commonwealth’s vision as stated in the plan and its emphasis on those with significant barriers to employment specifically because of what this means for many Philadelphians. The plan recognizes the unique nature of customer needs and Pennsylvania’s 23 local areas. Overall, we believe that if certain areas of the Combined State Plan offered additional flexibility, we may better achieve the state’s goals of offering a workforce system that works for evolving employer and job seeker needs. Thank you again for work and continued partnership so that we may support your goal of providing schools that teach, jobs that pay and government that works for all of Pennsylvania. Response: We appreciate the comments in support of the five broad goals and note that the State Plan seeks to balance local control and flexibility while assuring the governor’s priorities are achieved. • Philadelphia Works appreciates the WIOA–driven components that are present throughout the state plan and share in support for the state’s vision for the workforce system in Pennsylvania as articulated in the plan’s five broad goals. Establishing career pathways, investing in talent for targeted industries, increasing work–based opportunities for youth, engaging employers to strengthen connections across multiple systems and better utilizing data and increased data sharing are strategies that will certainly support and advance our organization’s work to advance Pennsylvania’s success. Response: We appreciate the comment in support of the vision. • We would

like to take some time, however, to share concerns and specifically discuss how some of these policies may impact our ability to meaningfully achieve the goals that the commonwealth has outlined. We appreciate the recognition in the state plan regarding the “uniqueness of Pennsylvania’s 23 local areas” (p. 88). Because of the state’s diversity and sheer size, it is certainly a challenge to develop a plan that responds to and accounts for industries and labor markets across Pennsylvania. As such, we believe it is critical to the success of our state that local areas receive sufficient flexibility and latitude to respond to the changing and evolving needs of employers and job seekers. It is through this lens that we respectfully offer the following issues for public comment in order of priority to our work. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor’s priorities are achieved. • LOCAL FUNDING – Training Benchmarks: Training is certainly important but it is only one component of WIOA services and may not be the ideal solution for all job seekers or employers. As such, training should be driven by local employer needs rather than prescribed thresholds. We ask that the commonwealth reconsider setting these benchmarks as doing so may come at the expense of other important services, including the success of our PA CareerLink® centers, program staff reductions, fewer resources for business services, and other programs and services. If, however, the commonwealth opts to move forward with these benchmarks, we recommend the following: o Consider re–evaluating the benchmarks based on what is currently spent by our local areas and allowing us to incrementally transition towards an appropriate benchmark. In other words, rather than setting an annual percentage benchmark, set a percentage by which we must increase our training spending so that the benchmarks account for the diversity of each local area while ensuring that additional training dollars are being spent. Recommended Language: The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set–aside to be used for new and innovative approaches. In Program Year (PY) 2016, each local area will increase spending of their training dollars by X% and increase their spending by this percent each program year until PY 20XX. o Exclude dislocated workers and youth from the training expenditure calculation. While this may be the state’s intent, the language in the state plan should explicitly address it. Recommended Language: The commonwealth will establish benchmarks for how much WIOA Title I adult funding must be used for training by local areas to include a set–aside to be used for new and innovative approaches. o Broaden the definition of training as much as possible to include additional types of training and training–related activities. Recommended Language: For purposes of this section, training includes all allowable training activities under WIOA section 134 as well as additional types of training activities including, pre–apprenticeship, pre–vocational, entrepreneurial, paid work experience, internships, transitional jobs, short–term training offered by private providers and industries, workforce preparation activities that increase job readiness, work–based training and other types of training not provided by formal educational institutions. o Exclude the administrative portion of Title I contracts when calculating the denominator for training expenditures, mirroring the structure for calculating the 75% out–of–school youth minimum expenditure requirements. Recommended Language: The training expenditure rate is calculated after excluding 10% of local administrative expenditures. o Finally, in pursuit of WIOA and the commonwealth’s goal of system connectedness and alignment, allow training to include funds from other sources such as: ? One–stop partner program training expenditures for participants dual enrolled in the one–stop partner program and WIOA; ? Discretionary grants (American Apprenticeship, NEG, H1–B, Workforce Innovation Fund, Rapid Response, National Dislocated Worker training); and ? Related costs such as registration, books, lab fees, required uniform, and applicable staff/center time, etc. Recommended Language: LWDBs may use other sources of funding, including Industry Partnership, TANF, discretionary grant funding, to count toward and offset the Title I training targets as well as costs related to and required for training such as registration, books, lab fees, required uniforms, administrative costs, etc. We believe the inclusion of these options will still help achieve the Governor’s goal of targeting 85,000 individuals per year through Department of Community and Economic Development (DCED) and Labor & Industry (L&I)

training programs. Additionally, we would value an opportunity to hear more about the rationale behind these benchmarks so that we may offer alternative opportunities to advance the best interests of both the state and local workforce systems. We also appreciate the inclusion of technical assistance and ask that regardless of the outcome for this provision, the state continue to support the work of local boards through technical assistance. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We also note that administrative funds will not be used when calculating the training benchmarks. • LOCAL FUNDING – Transitional Jobs: Transitional jobs are a new program component under WIOA and the federal proposed rules stated that local areas may reserve up to 10 percent of their total adult and dislocated worker allotments for transitional jobs. We urge the commonwealth to adopt DOL's position and allow local boards to determine whether and how much funding to dedicate to transitional jobs programs versus other interventions for certain targeted groups, such as work experience. Recommended Language: LWDBs and PA CareerLink® centers may use between 5 percent and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and ensure that priority of service for transitional jobs, if applicable, is afforded to individuals who qualify. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. • LOCAL FUNDING – Priority of Service: Comments: We anticipate that this benchmark will limit our ability to address the unique needs of our communities. This also may have unintended consequences as areas may resort to withholding services from those who do not qualify for priority of service to achieve the 70% mark if that local area cannot find adequate demand. However, if the commonwealth determines that setting a benchmark would be in the best interest of each local area, we offer the following:

o Consider delaying implementation of this provision for a year (or more) so that we can understand priority of service needs throughout the commonwealth. Then, implement one of the following options: ? Allow local boards to establish the percentages themselves based on analysis of initial program year data as LWDBs have an intimate understanding of their local area's needs. ? Apply the initial program year's data for determining the baseline goal that local areas should seek to attain rather than starting with a benchmark immediately. o Encourage self–attestation. When enrollment of an individual into priority of service hinges on documentation, we are faced with a significant burden, especially when these individuals are many of the most vulnerable and may not have regular and easy access to documentation. Further, from a technical and implementation perspective, this strategy requires the development of appropriate reports to allow local areas to monitor this metric locally so that we can take action prior to the need for technical assistance. We also ask that the state offer more regular frontline staff training so that relevant information is accurately captured. Recommended Language: As priority of service has been greatly expanded through WIOA, in order to establish a baseline by which the priority of service benchmark should be calculated, the commonwealth will utilize the first program year for evaluation to ensure that benchmarks are informed by practice. The commonwealth will support LWDBs ability to monitor data to determine the percentage of those served who are individuals with priority of service by developing a reporting template. This program year data will be applied by each local area to determine an appropriate percentage. Using the method of reporting developed by the commonwealth, LWDBs and PA CareerLink® centers will ensure that they are meeting this percentage of clients who qualify for priority of service. Should this percentage be less than this percent, the commonwealth shall provide the LWDB or PA CareerLink® center with technical assistance to ensure that effective affirmative outreach efforts to individuals with priority of service are made. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • State Plan: (p. 67) The commonwealth, LWDBs, and PA

CareerLink® centers shall provide priority for Title I individualized career services and training services… Comments: As a technical amendment, this language should clarify that this applies only to Title I Adult services and not dislocated worker services. We believe this was the state's intent but a statement to that effect would help resolve any uncertainty. Response: We appreciate the comment and agree that the 70% requirement does not apply to dislocated worker services and will make that clear in the state plan. • State Plan: (p. 70) LWDBs and PA CareerLink® centers must obtain permission from the commonwealth before transferring Title I–B funds allocated to the Adult Program to the Dislocated Worker Program and to demonstrate before doing so that goals for serving groups entitled to priority of service have been met. Comments: We ask the commonwealth to offer a clear means to demonstrate that goals for serving groups entitled to priority of service have been met in the event the need arises. They should also provide standard and sufficiently clear documentation requirements to make the case. Response: We appreciate the comment and will take it under advisement as policies are developed. • EFFECTIVE ENGAGEMENT OF AND SUPPORT FOR THOSE WITH BARRIERS TO EMPLOYMENT: We value the emphasis throughout the plan on those with barriers to employment because of what this will mean for many Philadelphians and Pennsylvanians. Strategies such as "mainstreaming job seekers with barriers to employment to the maximum extent possible" (p. 9) are especially effective as it will not only ensure that targeted populations will benefit from the implementation of strategies such as career pathways but it will also help reduce redundancies across systems and departments. Again, in order to fully advance the success of the commonwealth's goal, we offer the following comments. Response: We appreciate the comments. • State Plan: (p. 9) The commonwealth will also support placement of individuals with barriers to employment into quality entry–level jobs that provide the work experience and non–technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry–level jobs can serve as "on ramps." Comments: This provision offers an important result that we support. However, the larger strategy should include some acknowledgment that not all of those with barriers will be ready for career pathways as other areas of the plan address (i.e., p. 10: 1.9). Sometimes an effective "on–ramp" is the best solution even if it means we are getting someone to work for 23 weeks because it may advance that individual towards the end goal of quality employment. Recommended Language: The commonwealth will also support placement of individuals with barriers to employment into entry–level jobs that provide the work experience and non–technical skills necessary to lead to quality employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such entry–level jobs can serve as "on ramps." Response: We appreciate the comment but are unsure where the commenter wishes for us to incorporate the language, which, as noted, is included on page 9 of the plan under Goal 1.7. • State Plan: (p. 15) Low–quality jobs have high turnover rates and limited opportunity for advancement, bringing into question the return on investment of limited WIOA resources. State Plan: (p. 16) The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on–the–job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On–the–Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state–funded workforce partnerships to employers that offer high–quality jobs or jobs that are likely to lead to high–quality jobs. Comments: While we understand the emphasis on high–quality jobs, certain populations such as out–of–school youth might be challenged to find a quality first job and may need further assistance prior to reaching a "high quality job." The term "low quality jobs" undermines the effort of each individual's achievement related to their current capacity. The quality of a job should be relevant to the skills that an individual can develop in a given work environment. In reality, any work experience, while it does not fall under the "high–quality jobs" category, might help job seekers move forward with their education and help them set career goals. Additionally, some jobs include automatic increases based on a labor management or apprenticeship agreement but may not initially

meet the high–quality job standard for at least a year or more. We believe a critical emphasis on only job quality would exclude other jobs that are important to our job seekers. Recommended Language: The commonwealth will balance job quality in engaging employers with the need for effective on–ramps when prioritizing funds to be used for business services activities, on–the–job training and incumbent worker training to those employers offering high quality jobs and jobs that may lead to high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On–the–Job Training (OJT) contract described in paragraph 4.9 below that encompasses jobs that may lead to quality jobs. The commonwealth will also use these criteria to target Industry Partnerships and similar state–funded workforce partnerships to employers that offer high–quality jobs or jobs that may lead to high–quality jobs. Response: We appreciate the comment, but regrettably feel there are "low–quality jobs" and we are trying to reduce the number of them. • State Plan: (p. 46) The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, other services must be secured through partner programs and community and faith–based organizations. Comments: This provision is an important acknowledgment that supportive services are oftentimes critical to a job seeker's success, especially those with barriers to employment. In order for this goal to be fully achieved, the commonwealth must make sufficient funding available across all programs to have a good outcome from leveraging programs. Otherwise we are shifting the burden to partner programs and, as a result, serve fewer and fewer residents in order to meet minimum standards. Rather than requiring this, the plan should encourage it because LWDBs ability to secure services through partner programs is contingent on sufficient funding of other programs, an area we have no control over. Recommended Language: The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, local boards are encouraged to secure other services through partner programs and community and faith–based organizations based on local needs. Response: We appreciate the comment and utilized the recommended language in the plan. • YOUTH State Plan: (p. 84) Considering the tailoring of strategies for young adults by age group, 18–21 and 22–24… An emphasis on available work experiences and employment services, rather than education and basic skill building, is preferred for this older group. Comments: We seek to engage youth of all ages by emphasizing and prioritizing education that is connected to work experiences rather than experiences and employment services exclusively. Finding employment may be challenging for older youth and/or younger adults with low literacy and numeracy levels. We recommend including language that clarifies that older, low–literate youth and young adults should have access to both education and employment–related services, including blended and integrated models. Recommended Language: . . . for this older group. When older youth and young adult clients have low literacy and numeracy levels, however, local areas should consider integrated, contextual strategies that blend work experience and education. Response: We appreciate the comment and have added the suggested language to the plan. • State Plan: (p. 85) If a participant disengages from the program at any point, calls, texts, visits and messages on social media are ways to find out why the participant is no longer engaged and let the participant know that he or she can return whenever he or she is ready. Engage adult mentors along with case managers. Such mentors can play a key role in keeping participants engaged with the program. Comments: In many cases the most intensive efforts will not be enough for youth and young adults to reengage. In an effort to promote a method of effective outreach that weighs the availability of provider resources with realities that have been tested by practice, the commonwealth should consider extending the time period to reestablish eligibility from 90 days to 180 days and offering a clear definition of what qualifies as sufficient outreach. Recommended Language: . . .with the program. If sustained, documented efforts have been made to re–establish contact over a 180 day period, then the local board will have met its responsibilities. Response: We appreciate the comment and will take it under advisement as policies are developed. • State Plan:

(p. 14) The commonwealth will encourage the co–enrollment of high–risk OSY, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to allow for the leveraging of funds and provision of necessary services. Where appropriate, co–enrollment in Title II adult basic education services, EARN, TANF and other partner programs will also be encouraged. Comments: Locally, PA CareerLink® centers do not have the current capacity to address the unique needs of older youth. We have found that younger adult males produce lower performance in common measures data. With a coordinated inter–program effort, that includes sufficient training or youth–focused staff, to offer this groups the full array of services available, we will have the ability to better support this age group while helping common measures and aligning with state goals. Recommended Language: . . .also be encouraged. To this end, the Commonwealth will support training models that help to equip center staff with the skills and knowledge they need to successfully work with and support older youth and young adults. Response: We appreciate the comment and will certainly look for ways to support local areas in these efforts. • State Plan: (p. 85) Recommending the design of a comprehensive community workforce development system. Comments: We appreciate the commonwealth's recognition of the important role that that youth councils serve. The design for the full workforce development system rests with the board and the CEO and this provision should be appropriately revised to reflect the focus of youth committees in relation to the LWDB. Recommended Language: Recommending a design to incorporate youth into the community workforce development system. Response: We agree with the commenter that the design of the system rests with the board and chief elected officials. We note that the section states that Youth Committee activities "may include" this provision and that the provision is merely recommending, not establishing the system design. • DATA, PERFORMANCE AND THE COMMONWEALTH WORKFORCE DEVELOPMENT SYSTEM (CWDS): State Plan: (p. 31) WIOA Performance Goals for Core Programs Comments: Since the measurement periods for the Employment, Retention and Median Earnings are new, historical data is unknown to local areas. The state must make this data available in order to allow for effective local negotiation. Because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, we respectfully request that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act based on the following. o The parameters for the calculation of the measures have not yet been issued by the USDOL and will not be issued until after the state plan is due. o There are 3 new adult/dislocated worker measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance. o There are 4 new youth measures, for which, there is no existing baseline established under previous legislation upon which to estimate performance. o The method for calculation of all the WIOA measures will not be the same as under previous legislation. o Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the wage record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, DOL will be working on improving reporting, as we enter into WIOA, however, we will still working under the current reporting system. o The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)). Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • State Plan: (p. 18) The commonwealth will embark on a comprehensive upgrade of the Commonwealth Workforce Development System (CWDS) and JobGateway® to provide for better job seeker and employer experiences and allow staff greater case management and performance accountability functionality within and across core programs. To the degree possible, the commonwealth will also look at ways to integrate CWDS with the case management systems of other partner programs. State Plan: (p. 29) Refining the Commonwealth Workforce Development System (CWDS), the system of record used by the commonwealth to

collect participant data and report performance outcomes, to allow for more effective case management for job seekers, employers and agency and partner staff. This will include attempts to integrate CWDS with the case management systems of other partner programs. Comments: This would be a welcome change as it would allow for sharing information across programs, especially Title II providers and Title I providers as well as OVR, veterans and PHA. Linking CWDS to existing provider case management systems is an important direction for supporting greater access to and use of data among job seekers, employers and workforce professionals. Within the workforce professionals category, we recommend highlighting the importance of supporting access to data among both providers directly serving youth, as well as intermediary providers that help to support youth providers in larger markets. From a procedural perspective, in order to offer a system of record that meets the need of the state's workforce system, we recommend the commonwealth begin with the best database or newest technology available rather than seeking to repurpose CWDS. Response: Thank you for your input. The commonwealth has no plans to scuttle the CWDS system and we are planning to continue to evolve the system with technology updates. Many of the most recent changes have dealt directly with enhancing the case management system. • State Plan: (p. 17) Investments in workforce development programs will be made based on data and return–on–investment analysis. Comments: This provision should acknowledge that local areas must have advanced opportunities for input. Many LWDBs, including Philadelphia, are looking at calculation of ROI and both parties will benefit from advanced discussions around analysis methods. Response: We appreciate your comment and look forward to receiving stakeholder input as we move forward with the development of this analysis. • State Plan: (p. 18) The commonwealth will evaluate available data including how it is presented and released, to ensure that job seekers, employers and workforce development professionals have the information necessary to make informed decisions. Comments: We are excited to see that data sharing and more effective use of data are a specific goal areas in the plan. To strengthen this section, we would suggest that the plan place more emphasis on the importance of real–time implementation data that can support greater understanding of program quality. By emphasizing program implementation metrics, providers and intermediaries have access to information that: (1) helps support program refinements, and (2) ensures that providers are supporting quality experiences for participants that are more likely to lead to achievement of common measures. Response: We appreciate the comment and are committed to utilizing more real–time data where feasible. • Overall, we ask as well that the state plan provide some more specific timelines by which these strategies are to be accomplished. Because the plan addresses a four year timespan, as we begin our own preparation, it would be helpful to see times by which some of these innovations may begin implementation. Response: We appreciate the comment and as timelines are developed will share them as appropriate. • State Plan: (p. 10) The commonwealth will require On–the–Job Training (OJT) and incumbent worker training, whether provided through WIOA core programs or the Industry Partnership program, to be tied to a career pathway. Comments: Unless the pathway is already an employer–defined one, this goal may be difficult to document and achieve. If it were to be implemented, the commonwealth must be prepared to document pathways prior to beginning an OJT and nimbly adopt WIOA–compliant career pathways. This strategy may also result in restricted funding to employers unless some flexibility is provided. Recommended Language: The commonwealth will encourage that On–the–Job (OJT) and incumbent worker training . . . be demand–driven and complementary to a career pathway. Response: We appreciate the comment and recognize that career pathways need to be defined and refined over time. • State Plan: (p. 16) The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi–employer workforce intermediaries that serve employers with common skill needs in their local workforce areas. Comments: While we would encourage the Commonwealth to continue funding this important sector strategy, this provision would also be clearer with some additional information: Will this be through additional WIOA funding (in addition to the state funds)? If so, under what line item? How do we make the percentage for training under this scenario? Response: The commonwealth envisions Industry Partnerships as a

state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training. We also note that the training targets have been revised to include support of IP training among the activities that count toward LWDBs' satisfaction of the training target requirements. • State Plan: (p. 34) Provide advice, ideas and support on the development and implementation of the commonwealth's workforce goals and associated initiatives. Comments: The LWDB represents areas across the commonwealth to ensure that the strategies of the state board are inclusive of the state's diversity. Accordingly, it is crucial that state board members have working relationships with their LWDBs and are able to speak to the local area's needs. Recommended Language: Comment on commonwealth policy and guidance before it is implemented using local constituents as sources of feedback. Response: We appreciate the comment and can share it with the State Board for consideration should they wish to amend their by–laws. • State Plan: (p. 180) Individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On–The–Job training program or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed. State Plan: (p. 180) The PA CareerLink® centers will also help individuals participate in job fairs and other employer recruiting events. Individuals with multiple barriers will receive priority of service designation so training services can be readily available. Comments: In order for this strategy to be fully recognized, state rules on EARN participants' ability to participate in training and federal rules on TANF core activities need to be re–evaluated. Response: DHS will provide flexibility to participants who need additional training to access employment. DHS will not be able to change any federal rules that govern a participant's ability to participate in services beyond the legislated time limit. • State Plan: (p. 221) The DOC proposes a collaborative partnership with the State Department of Labor & Industry via an REO workgroup. Comments: This coordination on DOL reentry grants would be positive. We ask that L&I include LWDBs in the workgroup or through consultation to ensure that the local perspective is considered. Response: We appreciate the comment and will consider inclusion of LWDBs in the workgroup. • State Plan: (p. 94) Every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the "Agricultural Specialist." Comments: For Philadelphia, sharing an area representative makes more sense as the need is not as present. If each of Philadelphia's centers has such a representative, it would be an inefficient use of training resources. Response: Please note that, according to the plan, the Agricultural Specialist may have other duties. These "Agricultural Specialists" are used for specific agricultural purposes and used only as needed. There is no duplication or redundancy of services, and therefore there is no additional incurred or inefficient use of training resources. • State Plan: (p. 266) Competitive grants to multiple Industry Partnerships in a specific cluster (e.g., advanced manufacturing, health care, logistics and transportation) that agree jointly to develop and use sector–specific benchmarking tools that track the impacts of strategic workforce investments on employer outcomes. (Outcomes might include turnover in long–term care, scrap rates and uptime in manufacturing, and on–time delivery in logistics and transportation.) These tools would be another way to encourage sector partnerships to tackle higher–order organizational improvement issues with a potential to increase the return on investment. Comments: Employers may find these requirements to be invasive and may therefore stop participating. The goal is to help employers engage. If this strategy is pursued, we ask that the commonwealth give strong consideration to employer needs and perspectives. Response: We appreciate the comment and note that application for these funds would be voluntary. • There are many components of the state plan that we see as extremely positive to support our work and while we may not be able to list all of those areas here, we would like to especially thank the Commonwealth for consideration of the following strategies and encourage their implementation, in addition to the acknowledgments mentioned earlier (ordered chronologically). Response: We appreciate the support. • State Plan: (p. 12) The commonwealth will seek to obtain grants to assist in serving individuals entitled to priority of service and will additionally make discretionary state funds available to support the serving of these

target populations. Comments: We commend this goal as a critically important one to pursue. If achieved this would be an integral way for the workforce system to gain more flexibility in service delivery to priority of service individuals and other target populations. Response: We appreciate the comment in support of this effort. • State Plan: (p. 13) Recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (e.g. self–attestation, co–enrollment, career pathways and retention) to help local area staff successfully meet the needs of those individuals. Comments: We understand the importance of balancing flexibility with accountability and want to recognize that self–attestation is an important and necessary option to reduce operational resources and time. We value the ability to offer it to many of our clients who realistically do not have easy or any access to required documentation. Response: We appreciate the comment in support of this policy. • State Plan: (p. 14) The commonwealth will work with the U.S. Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out–of–school youth being served within the commonwealth and in each local area. Comments: This position will allow all parties to have a more accurate depiction of workforce activities and population groups within each area, allowing us to identify the unique needs of each area and region. In order for this goal to be fully achieved, the statistical model should be sufficiently validated. Response: We appreciate the comment in support of this effort. • State Plan: (p. 14) In recognition of the focus of federal funds on OSY, the commonwealth will leverage state resources to increase summer employment opportunities for in–school youth. . . The expansion is aligned with President Barack Obama's My Brother's Keeper initiative and Philadelphia's My Brother's Keeper Challenge. Comments: We appreciate the Commonwealth's commitment to additional funding support for youth summer employment and other programming beyond that provided through WIOA. We look forward to continued partnership with the state regarding opportunities for flexible funding for in–school youth through strategies such as those mentioned on p. 87. Response: We appreciate the comment in support of this effort. • State Plan: (p. 46) Trained and informed staff is another critical element to providing comprehensive, high–quality service. An expanded curriculum of standardized courses, technical courses, conferences and workshops enhance knowledge, skills and the professional development of workforce professionals in PA CareerLink® centers, LWDBs and partnering agencies and promote a collaborative and consistent service delivery through information exchange and learning. Comments: We agree – trained and informed staff is critical to high–quality service delivery. This strategy would be more effective if the state offered more on the level of implementation (i.e., 2 trainings available to all local areas per year). Further, in addition to training, there need to be protocols that guide people in changing their practice going forward after initial trainings, and follow–up coaching, which is very different from monitoring. Response: We appreciate the comment and suggestions, which we will take into consideration in determining future staff training. • State Plan: (p. 54) Additionally, a number of LWDBs are considering the use of Executive Pulse to aid in coordinating business engagement between workforce and economic development partners on the regional and state level; the commonwealth encourages this coordination. Comments: We appreciate the coordination that the commonwealth encourages as it will also be helpful to access this CRM at a reduced licensing cost. Response: We appreciate the comment in support of coordination. • State Plan: (p. 81) In cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry–level positions that provide the work experience necessary to lead to employment in HPOs. Comments: This is critical if work experience is to provide the resource for those who are further from entry–level employment in a career pathway. Response: We appreciate the comment in support of this policy. • Conclusion: In sum, we believe the state plan offers much opportunity for the Commonwealth to achieve at unprecedented levels and respectfully offer our comments in support of that goal. We appreciate the vision of the commonwealth as stated in this plan and are excited about the level of interagency coordination that is taking place to ensure that we are at the forefront of workforce development as it exists across the

country. We look forward to continued collaboration with new and existing partners at all levels of government and across titles as we move deeper into WIOA implementation. Response: We appreciate the comment and too look forward to continued collaboration. Cheryl Johnson of PICCC commented: There are many good things in the State Plan that we are looking forward to working with everyone to implement. There is one area of the plan that I would like to speak to today that could have unintended consequences – that being the mandated percentages of WIOA dollars set aside for training. We share the desire to increase credentials among people in our communities and State. In the Southern Alleghenies region our Board and One Stop Operator are already using flexible and Innovative approaches to meet significant training needs – such that we have no one on the waiting list for training that cannot be funded and almost always have training monies that have been set aside remaining at the end of the fiscal year. Our approach is to use WIA/WIOA funds to provide for the full array of services allowed in the law which can only be offered and funded thru WIOA. A portion of WIOA funds are set aside for training but the majority of our training needs are met through funding sources that cannot be used for staff/operations but can be used for training. Our training needs have been met through TRADE, NEG, Rapid Response, and JOBS first, etc. in a very effective way and other services desired by employers and job seekers can be met through WIOA. When comparing the High Priority Occupations List covering occupations allowable for investing training dollars in, we find many high priority occupations in our area require a bachelor's degree or above. In contrast, the hardest to serve populations coming into our CareerLinks for services – have little to no readiness for post–secondary education. This creates a huge gap that must be filled with other services even to get individuals prepared to successfully take entrance exams much less to succeed in training. Many individuals we work with have low literacy, lack computer skills, have poor work histories, low prior academic achievement and many other barriers. Funds that are taken away and placed in a training line item will not be available to meet these many needs. We have no other sources to meet these needs but we do have other sources we could use for training. There are many other reasons why we believe there are negative consequences to a mandated percentage of WIOA funds set aside for training, which others are addressing in their remarks so I will end my remarks here. In closing, we respectfully request that this requirement be removed from the state plan and that Local workforce areas be given the opportunity to use flexibility and innovative strategies which allow our regions to be responsive to each ones unique needs instead of a one size fits all approach that we believe will be detrimental to our employers, job seekers and communities. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. Helene K. Nawrocki of the Potter County Education Council offered multiple comments to include: • Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 39–44 Alignment with Other Partner Programs o The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities. • Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 51–53 Leveraging Resources to Increase Educational Access o The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of training programs based on identified need and demand. • Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 53 under the heading Improving Access to Postsecondary Credentials o The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities. Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53. Rachel West of Poverty to Prosperity Center for

American Progress offered multiple comments to include: • The Center for American Progress (CAP) strongly supports the comments submitted by Community Legal Services (CLS) and the Community Justice Project (CJP) regarding Governor Wolf's Proposed Workforce Innovation and Opportunity Act State Plan (published for public comment on December 28, 2015). CLS and CJP's comments emphasize the importance of using the full amount of funding designated for transitional jobs (also called subsidized employment). Based on our research and expertise in this area, the Center for American Progress is pleased to join CLS and CJP in strongly urging that Governor Wolf use the full amount of designated funding to create transitional jobs for Pennsylvania's disadvantaged workers. Response: We appreciate the comment in support of the Plan. In view of the expansion of LWDB financial support and inter–organizational coordination responsibilities mandated by the plan, we believe that the plan's requirement that LWDBs and PA CareerLink® centers spend between 5 and 10 percent of their funds on transitional jobs is appropriate. • Transitional Employment under Pennsylvania's Proposed WIOA State Plan: The Workforce Innovation and Opportunity Act (WIOA) allows states to spend up to 10 percent of Title I funds on transitional employment opportunities for participants. Under Pennsylvania's Proposed WIOA State Plan, local workforce development boards and CareerLinks would be required to use between 5 percent and 10 percent of their funds to provide transitional jobs, especially to individuals who qualify for priority of service. (See the Proposed WIOA State Plan, p. 70.) CAP strongly supports the comments submitted by CLS and CJP on this provision, urging Governor Wolf to use the full amount of funding designated for transitional jobs. Response: We appreciate the comment and note that the state requirement enhances the WIOA allowed use. • The Need for Transitional Jobs among Pennsylvania's Disadvantaged Workers: More than six years after the end of the Great Recession, certain groups of Pennsylvania's workers continue to experience elevated levels of unemployment and labor market detachment. Many are individuals who face severe labor–market disadvantages or barriers to employment, among whom high rates of joblessness will remain a persistent problem even in healthy economies. These include individuals who qualify for priority of service under Pennsylvania's plan: individuals with criminal records, out–of–school youth, and recipients of income supports. Because they will continue to be excluded from the labor market without further assistance, these individuals are currently denied the economic security and opportunity that comes with a job. CAP has studied barriers to employment among each of these populations in its recent work, and has determined that targeted policy action such as a transitional jobs program is required to help these disadvantaged and detached groups regain and sustain employment. Individuals with criminal records: One in three American adults have some type of criminal record. This translates into nearly 3 million of Pennsylvania's citizens. Individuals with even minor criminal records can face a host of legal, social, and economic obstacles to employment, including widespread employer use of background checks and laws that systematically bar individuals from many licensed occupations. As discussed in detail in our One Strike and You're Out report, 3 in 5 formerly incarcerated men remain unemployed one year after their release, and the typical formerly incarcerated man will have lost nearly $180,000 in lifetime earnings relative to a never–incarcerated man by the time he is 48. Moreover, recent CAP research estimates that nearly half of American children under 18—including more than 1.2 million Pennsylvanian children—have at least one parent with a criminal record. Children of parents with records face a far greater risk of poverty and hardship; enabling these parents to provide for their children through job opportunities should be a top priority, particularly in a state where nearly 1 in 5 children live in poverty. Targeted policies that help returning citizens get a foot in the door of the labor market are critically needed to ensure that a criminal record is not a life sentence to poverty for justice–involved individuals and their families—and to enable Pennsylvanians with records are able to successfully reintegrate into their communities. Opportunity youth: Youth face elevated levels of unemployment: In 2014, the unemployment rate among those ages 16 to 24 was twice the national average, and was even higher among minority youth. What is more, many of these youth came of age and entered their working years during the Great Recession when jobs were scarce—particularly for those with little or no work experience and minimal

education. Research shows that cohorts who graduate in a recession face permanently depressed employment opportunities and earnings trajectories. Targeted policy action is needed to ensure that these individuals are not consigned to a life of poverty by a lack of job opportunity and experience throughout their critical initial years in the workforce. Individuals with disabilities: CAP's work has documented the large hurdles that individuals with disabilities, in particular, face in accessing employment opportunities. Working–age individuals with disabilities face poverty rates nearly three times higher than those without disabilities—in large part because they are more than twice as likely to be unemployed. Recipients of income assistance: Over the past two decades, eligibility for public–assistance programs has become increasingly tied to employment. For most American adults, the best pathway out of poverty is still a well–paying job. However, the increased contingencies placed on public assistance have not been accompanied by increased resources for job search—much less a job guarantee for all those who are able and want to work. Thus, this trend leaves those who have barriers to employment with very limited access to resources to make ends meet, or to facilitate successful job search. This lack of resources can compound the very barriers individuals face, leading to a downward spiral of poverty and hardship. As policymakers make social assistance increasingly contingent on work, assistance in accessing job opportunities will literally provide the only means of survival for low–income and vulnerable individuals who find themselves shut out of the labor market. Response: We agree that individuals with criminal records, opportunity youth, individuals with disabilities and recipients of income supports are often well–suited for transitional employment opportunities. • Transitional Jobs: A Solution for Pennsylvania's Low–Income Workers, Local Businesses, and the Commonwealth's Economy: In a 2015 report, A Subsidized Jobs Program for the 21st Century, CAP surveyed the literature on subsidized and transitional employment programs in the United States. The report found that recent subsidized jobs programs have had positive impacts on participants, including increased income, improved employment outcomes, and reduced recidivism. The report strongly recommended the creation of state–level subsidized employment programs—modeled after states' successful experience using Temporary Assistance for Needy Families (TANF) Emergency Fund dollars during 2009 and 2010 —and urged that states be given the flexibility to determine how best to serve their target populations. CAP specifically highlighted Pennsylvania's Way to Work Program as an exemplary state initiative during this period (see page 9 of the report). The program—which drew praise from participants and local business owners alike—suggests that Pennsylvania's Department of Labor and Industry and its Department of Human Services already have the institutional knowledge required to operate a highly successful transitional jobs program in Pennsylvania. A state–wide transitional jobs program presents a strong policy option for helping disadvantaged workers get a foot in the door of the labor market. For the populations of struggling workers that Pennsylvania is targeting, transitional jobs can alleviate hardship in the short term by providing immediate work–based income, while also providing valuable work experience that will improve their employment credentials. In addition to benefitting low–income workers and their families, a transitional jobs program would also help buffer Pennsylvania's economy against future recessions, softening the impact of future downturns by counteracting increases in unemployment, enabling businesses to preserve and expand their workforces, and boosting economic demand in local communities, and supplementing Pennsylvania's Unemployment Insurance (UI) and food stamps (SNAP) programs as an automatic stabilizer. Only twice since 1860 has the U.S. gone more than 8 years without a recession. So while the timing of the next recession is uncertain, today—almost 7 years after the Great Recession—is the time to put in place countercyclical programs like transitional jobs that will allow Pennsylvania's leaders to hit the ground running when the next downturn arrives. Response: We appreciate the comment in support of our approach. • Conclusion: For Pennsylvania's disadvantaged and low–income workers, transitional jobs offer a solution to poverty in the near term, and a gateway to improved employment prospects, higher income, and greater economic security in the long–term. But transitional jobs also represent a win–win–win opportunity for the Commonwealth, benefitting Pennsylvania's employers and its economy in addition to its struggling workers. CAP commends the

Wolf Administration for proposing that local workforce development boards and CareerLinks use 5 percent to 10 percent of their funds for transitional jobs—and echoes CLS and CJP in urging the Administration to use the full amount of designated funding for this critically important initiative. Response: We appreciate the comment in support of the requirement. Joseph Snyder of Process and Data Automation commented: I am confident that my peers have inundated you with form letters covering various legitimate concerns. I want to use this opportunity to focus on one key element of your plan: Goal 4: Engage Employers to Strengthen the Connection of Education and Training and the Economy, Increase Investment in Critical Skills and Increase Jobs that Pay....It is also critical that the commonwealth support employers who want to come together to address their training and human resource challenges in a more efficient, multi–employer way. The fragmentation of employers when it comes to workforce issues – recruitment, training, curricula, credentialing, career pathways – makes it more difficult for workforce services to align their programs with the common needs of employers. Pennsylvania is already ahead of other states in strengthening the voice of groups of employers in workforce development through its national leadership in building Industry Partnerships as well as its extensive investment in multi–employer apprenticeships. The commonwealth will build on its past experiences in order to improve employer engagement with the workforce system. The commonwealth will measure employer engagement through the yet to be defined federal measure and will also consider additional state specific measures, such as market penetration (the number of employers actively using the public workforce system) or the number and total employment of employers engaged with active Industry Partnerships, apprenticeship programs, or other multi–employer workforce partnerships. 4.1 The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on–the–job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On–the–Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state–funded workforce partnerships to employers that offer high–quality jobs or jobs that are likely to lead to high–quality jobs. 4.2 The commonwealth will seek to identify sustainable public and private funding, in addition to the annual state appropriation, for high–quality industry–driven sectoral workforce intermediaries, including Industry Partnerships and apprenticeship programs, to lock in on a permanent basis a strong connection between education and training programs and the demand side of the labor market. 4.3 The commonwealth will implement a program of capacity building, peer learning, and evaluation to support Industry Partnerships, apprenticeship programs, and other multi–employer workforce intermediaries in delivering greater value to employers; job seekers; incumbent workers and new hires, including young people and rehired dislocated workers; adults and youth participating in work–based learning at the companies and/or hired by the companies; and to their industry and regional economies. The commonwealth will consider establishing a formal certification program for Industry Partnerships. The actions of the State in FY 2016 are 100% counter to the items listed in your goal 4 and as illustrated above. This eloquently written plan for the coming years sounds great but it does not take into consideration the multiple “backwards steps” that our successful IP will take this year due to inaction in Harrisburg. Effectively de–funding our Industry partnership for an entire year will have an immediate impact on employers’ abilities to sustain training initiatives within the current year while breaking continuity with ongoing programs. The long term impact of this year’s (in)action goes much further in that we will have a more difficult time bringing employers to the table to support future initiatives. Our IP has been successful in bringing a large number of new employers together regularly and your future measurements will show apathy and disbelief in the system after these efforts are rewarded with zero funding for this year. IP members are all volunteers who have regular responsibilities within their native organizations. Their bosses demand return for the time investment put into the IP and the disappointing answer going back to dozens of executives in NWPA this year is “no funding…..politics as usual”. Response: We appreciate your support of our approach to employer engagement, to which multi–employer

partnerships are key. We share your frustration regarding FY 2016 Industry Partnership funding. We note that the Governor proposed a $10 million increase in IP funding and is fully committed to the success of the program. The state plan requires LWDBs to support IPs. We will also seek additional sources of non–state (federal and foundation) funding for IPs. Julie Forster of Public Interest Law Center offered multiple comments to include: • This letter is sent on behalf of the Public Interest Law Center in formal response to the Pennsylvania's notice of request for comments on the Combined Pennsylvania Workforce Development Plan to implement the Workforce Innovation and Opportunity Act (WIOA). We appreciate the opportunity to comment on the proposed Plan. The Public Interest Law Center has advocated for many years to assist Pennsylvanians with disabilities to live and work in the community. At the outset, we would like to applaud Pennsylvania for Goal 2.10 to adopt an Employment First policy in Pennsylvania. Page 39 identifies an Employment First policy in Pennsylvania. Adopting and implementing an Employment First policy is necessary to build Pennsylvania's workforce and provide people with disabilities meaningful access to the workplace. The Plan mentions collaboration among PDE, DHS and L&I to develop and implement Employment First. Such collaboration is crucial to successful implementation, and should be detailed more fully. Response: We appreciate the comment in support of an Employment First policy and note that the plan states that "Employment First" will be the policy of all executive branch agencies under the jurisdiction of the Governor in serving persons with disabilities. Additionally, PDE, OVR and DHS will take important first steps to collaborate to develop a training strategy to help school district IEP teams learn Employment First principles. • As a global comment, the Pennsylvania Department of Education (PDE) and Local Education Agencies (LEAs) play a crucial role in WIOA implementation. Unfortunately, the proposed Plan only imposes obligations on PDE for adult basic education and seeks mere cooperation to serve youth with disabilities in transitioning from school to employment. PDE must take a more active role, and the Plan should impose clear requirements for LEAs to effectively support students with disabilities in transitioning from school to work. Response: PDE recognizes that LEAs have substantial obligations serving youth with disabilities especially related to transition from school to employment. PDE is pleased to work with OVR/DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work and educational opportunities. • More specifically, at page 143, OVR takes responsibility for career education and counseling, but the Plan does not require PDE or LEAs to reach out to OVR for services. The most efficient way to disseminate OVR resources is to train IEP coordinators of each school. LEAs already have contact with the students and families who OVR seeks to serve through the 15% reserve for transition–age youth. PDE must commit to training all IEP coordinators in every school district on the need for paid work experiences for all students, including those with disabilities, and the services available through OVR for students who need support with that career planning. Most importantly, PDE must ensure that every student has a transition plan and that every plan includes the opportunity to explore employment. Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities and will collaborate with OVR to develop a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities. • Under the Individuals with Disabilities Education Act (IDEA), all students should have a transition plan in their IEP. We know that many high school students have IEPs that entirely fail to address transition. We urge PDE implement more oversight to ensure all students have a completed transition plan beginning at age 14 so that they can work toward the goals in their IEP. This combined state Plan must clearly delineate how PDE will coordinate with OVR to help OVR identify and connect with students who need services. Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities and will collaborate with OVR to develop a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities. • Pennsylvania should require each student's IEP to document a discussion of employment experiences, opportunities and services needed. We know

that having a paid work experience before graduating high school is a strong indicator of success in employment after graduation. Some students with disabilities may not need assistance to obtain after school, weekend, or summer work opportunities. Other students may need employment services. Many never get the opportunity because it is not presented as an option. This must be the responsibility of the LEAs. OVR cannot know each student's needs, but the LEAs are already tasked with that responsibility. Including a complete plan for transition services and employment in the IEP process is essential to connecting eligible students with OVR services. Response: We appreciate the comment and acknowledge the need for continued collaboration and partnership between OVR and LEAs in supporting students with disabilities to have paid work based learning experiences before graduating from high school. • OVR is tasked with preparing students with social skills and independence so they can be workplace ready. These are the core functions the IDEA assigns to schools. While OVR certainly should have a role in supporting workplace readiness, it is the LEAs responsibility to ensure all students are prepared with social skills and sufficient independence to enter a workplace. Sadly, we hear from employment services providers that some transition age youth are not prepared to even enter a public place, let alone work in one. LEAs must equip students with disabilities with the skills and experiences to set them up for success as adults in integrated community settings. OVR cannot be the only agency in this Plan that is responsible for ensuring students graduate school with social skills and independence. Response: We appreciate the comment and acknowledge the need for continued collaboration and partnership between OVR and LEAs in supporting students with disabilities to have paid work based learning experiences before graduating from high school. PDE understands the responsibilities assigned to schools by IDEA and will continue to provide support to schools in this area. • The Plan states that no educational agency may enter into an arrangement with a subminimum wage employment program, but does not require PDE to enforce this provision. PDE is the only agency that can ensure no school in Pennsylvania sends students to sheltered workshops. This is a central requirement of WIOA's Section 511. Nationally, fewer than 5% of people in sheltered workshops ever leave for competitive integrated employment. WIOA seeks to ensure students first get the opportunity for paid work in the community. Without a strong enforcement Plan, students with disabilities may continue to be excluded from the workforce, condemned to laboring in segregated workshops for less than minimum wage. Response: We appreciate the comment. PDE and OVR continue to explore and develop innovative services and supports for individuals with disabilities while we await final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. The provisions in section 511 are effective two years after WIOA enactment, specifically, July 22, 2016. Section 511 demonstrates the intent that individuals with disabilities, especially youth with disabilities, must be afforded a full opportunity to prepare for, obtain, maintain, advance in, or reenter competitive integrated employment. • Page 41 identifies an opportunity to connect services by integrating the PA–WDQI database with DHS, L&I and PDE. Page 65 similarly mentions that eData v2 will connect with CWDS to collect participant data. However, the Plan does not address how Pennsylvania will streamline intake and delivery of services. This is an opportunity to ensure that all students who need preemployment services are identified and can access them. In addition, a combined database can enable individuals to seamlessly transition from PDE to OVR to ODP, as needed. The Plan should require PDE to document all students who require preemployment services in this data system to automate referrals to OVR. This documentation and shared data system will also enable PDE to review which schools are successfully supporting students with disabilities to access employment opportunities and services, and which schools are simply checking a box on the form. Through a shared data system, OVR can expand Early Reach services to schools that have low referral rates and employment outcomes to ensure all students get transition and employment planning through the IEP process. Response: We appreciate the comment and will take it into consideration when discussing future expansions/enhancements of PA–WDQI and other state data collection systems. We note that eData v2 is specific to adult basic education data and does not include K–12 student data. • The Early Reach program is currently inadequate. OVR contacts high

school students through presentations and may give students written materials. OVR must engage and train all school IEP coordinators on transition and employment services. This Plan is the place to articulate requirements to ensure this happens. A 14–year–old student cannot drive herself to OVR for employment services. Parents and educators are integral to supporting students who need OVR services to access paid work experiences and transition planning while still in school. The Early Reach program must begin by training educators engaged in the IEP process, and PDE must commit to mandating all IEP coordinators attend training. In addition, Early Reach should use LEA directories to send information on OVR services directly to the homes of students with IEPs in their native language, so that their families are made aware of the services available. The Plan does not mention any efforts to ensure students with IEPs receive written information directly from OVR, much less in accessible language formats. Early Reach is an important program as OVR coordinators cannot be in every school. Happily, there are already IEP professionals in every school. OVR must build on this capacity to connect with all students who may be eligible for VR services.

Response: We appreciate the comment. OVR developed the Early Reach Program that puts Early Reach Coordinators out in schools and at community events talking about OVR services and how we can assist with transition. Because of its success, several OVR offices have elected to expand the Early Reach initiative and have hired additional “Early Reach Coordinators”. Additionally, PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities including but not limited to the Early Reach program. • Job services should integrate OVR job seekers and all Pennsylvania job seekers to avoid singling out individuals with disabilities. Response: We appreciate the comment, which appears to be in reference to the OVR Single Point of Contact (SPOC) model. We note that the SPOC model is to assist employers specifically interested in hiring individuals with disabilities. Individuals with disabilities will not be singled out and will be referred to all employers seeking talent. • Coordination with OVR and PDE to support people entering postsecondary education must also support transition–age youth who do not seek further academic work to transition to employment. Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities. • Why is OVR alone assigned to analyze the labor market demand for industry recognized certificates? This should be a unified effort among all partner agencies. Response: OVR is not solely responsible for this task. This item was simply meant as an example to demonstrate how the commonwealth will promote and increase attainment of postsecondary credentials. • On page 53 the Plan states that: "Education programs, including secondary and postsecondary Perkins and adult basic education, will provide professional development opportunities to help providers understand and navigate the full credentialing spectrum and develop expertise in occupational counseling." Does this mean Pennsylvania will provide education to private providers on occupational counseling? Why would Pennsylvania spend taxpayer dollars on employment services from any provider that does not already have an expertise in occupational counseling? Why would providers require adult basic education? Response: Professional development will be provided to staff working in educational programs, such as secondary and postsecondary Perkins and adult basic education, to help them gain skills in providing occupational counseling to students in their educational programs. • L&I’s assessment of CareerLink for ADA accessibility is essential to both serving Pennsylvanians in the workforce, and complying with federal law. Unfortunately, we have received reports that not all CareerLink centers are accessible to individuals with hearing impairments and visual impairments. It is important for L&I to continue regular assessment, but it must conduct a comprehensive review and follow up to ensure proper remediation. All state agencies, providers, and community colleges must meet these standards. Website and software accessibility is of particular concern for Pennsylvanians with visual impairments. Often website and software developers agree to provide accessible technology, but fail to adequately test or ensure that it is in fact ADA compliant. The rigorous review process L&I conducts to ensure accessibility of

CareerLink should be applied to all government services. All contracts for software development must mandate full ADA compliance upon condition of payment and ongoing remediation and support of accessibility features. In addition, L&I must ensure its own services are accessible, including job applications to BBVS. This is a particular concern at colleges, which have independent websites and many ADA compliance issues. At page 49, the Plan discusses partnerships with public and private colleges and universities. These programs must be accessible to all Pennsylvanians to effectively implement WIOA. The L&I review process should be expanded to ensure that all institutions of higher education have fully accessible websites, education software, and course materials. Schools must be required to train all instructors on how to create accessible PDFs, web content, and provide reasonable accommodations for coursework, exams, and in the classroom. Response: Workforce and VR have been collaborating with plans to increase accessibility and usability of not only the physical structures where PA CareerLink® centers are housed but also in regards to the services provided. This collaboration also includes L&I's Office of Equal Opportunity. This renewed emphasis goes beyond basic compliance by assisting local boards, the entities responsible for PA CareerLink® center location and leasing, with technical assistance when selecting sites, evaluating promising or negative features, options for assistive technologies and space planning. There is a likelihood that many boards will want to accommodate greater alignment of programs and consider new space options as partnership under the new law has expanded. It is our hope that this approach will help local boards meet a variety of accessibility needs. • The Plan at times refers to incorporating OVR with CareerLink One–Stop centers, and at other times refers to a separate OVR Single Point of Contact. Anecdotally, people with disabilities seeking services from CareerLink are referred to OVR because CareerLink does not have accessible computer software or support services for people with disabilities. Integrating the One Stop centers with OVR services and job recruitment is important so that people with the rest of the workforce in Pennsylvania's combined Plan. Response: We appreciate the comment and note our intentions to train and equip PA CareerLink® staff in an ongoing learning process with the knowledge, skills, and motivation to provide superior service to job seekers, including those with disabilities. • We request clarification that the training programs at community colleges, career and technical schools and other Perkins recipients occur in integrated settings. A training program exclusively for people with disabilities may place people at unnecessary risk of segregation, even within an otherwise integrated college campus. We also seek assurances from the state that such training programs will not replicate sheltered workshops, will not offer subminimum wage compensation, and will be time limited. It appears that is the intent from the Plan, but program providers must be clear on OVR's expectation to provide integrated training services. Response: We appreciate the comment. OVR has established an amendment to its college policy that provides funding for its programs that have been approved by the federal department of education has a comprehensive transition program (CTP). In order to reach this designation schools must ensure that their programs are being implemented in most integrated setting possible. OVR has not approved funding for programs similar to comprehensive transition programs due to the fact that they have not reached the same level of integration nor have they been approved by the federal department of education as a CTP. • OVR commits to provide career counseling to Pennsylvanians currently laboring in subminimum wage. We applaud OVR's commitment, and believe this is the right agency to provide the career counseling mandated by WIOA. However, the Plan does not state how OVR will provide this counseling. Many people laboring in sheltered workshops have been there for decades. They have not had experience with working, have been told they cannot work, or may have had negative experiences working. OVR must take care in addressing their needs. First, OVR should frame working or employment in terms of earning money, rather than getting a "job." Research has shown that people may have a negative reaction to the idea of getting a job or working because they have been told it is something they cannot do or have had a negative past experience with it. Many individuals are receptive to the concept of earning money, and employment counseling should be framed as earning money rather than working or getting a job. Second, OVR must commit to entering each subminimum wage employer in Pennsylvania to provide employment

information and counseling. Some people have not accessed employment because their residential provider or family does not want the person to work. Accordingly, it is essential to engage directly with each person who is currently working for less than minimum wage to ensure that he or she has in fact accessed the career services or couseling that he or she needs to understand the opportunities and services available for competitive integrated employment. Response: We appreciate the comment and await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. Once we have received that information we will be better able to provide the necessary guidance and training to OVR staff. • OVR is not the only agency with a key role in implementing Section 511. While OVR is responsible for providing employment services, ODP is responsible for approving Medicaid funding that pays for subminimum wage work. Prevocational services are provided in sheltered workshops, which pay less than minimum wage and segregate people with disabilities. WIOA commits to giving all young adults the opportunity to access the workforce before being shuttled into subminimum wage work. This plan should require ODP to ensure that every young person has had to access employment services before approving subminimum wage work and to document how that has been accomplished. Response: DHS agrees, which is why in a Medicaid waiver amendment approved by CMS on July 22, 2015, it included a provision that no new prevocational service for anyone under age 24 can be authorized in an Individualized Support Plan unless the person has first gone to OVR and been determined ineligible or their VR case has been closed. We also note that we are awaiting the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. • Finally, we question why all young people should not have the opportunity to work in the community. Why can a young person who has benefitted from the IDEA, which commits to preparing students for economic independence, enter a segregated adult day care facility without ever having accessed employment services? WIOA emphasizes the imperative to provide employment services to people with the most severe disabilities, including young adults with both physical and intellectual disabilities. We urge Pennsylvania to seize the opportunity under WIOA and commit to providing all transition–age youth with disabilities the opportunity to access career counseling and employment services before approving public funds for adult day services. Indeed, this step is necessary to implement Pennsylvania's Employment First Policy where "employment is the first consideration and preferred outcome for publicly funded services." Through customized employment, people with significant disabilities can bolster our workforce and provide important services to our businesses. This is the promise of WIOA. Response: We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. Dr. Anna Weitz of Reading Area Community College offered multiple comments to include: • On behalf of Reading Area Community College (RACC) I am pleased to offer comments on Governor Wolfs Workforce Innovation and Opportunity Act (WIOA) Combined State Plan proposed to be effective July 1, 2016. As a publicly supported, comprehensive community college located in the City of Reading but serving all of Berks County, RACC has a keen stake in workforce issues. This includes the proposed state plan that as now outlined intends to include a number of key programs and initiatives which have a major impact on those we serve and that previously have been administered differently. I also want to point out that RACC is the Commonwealth's only higher education institution to meet the federal threshold of being a Hispanic Serving Institution (HSI), one located in the heart of a severely economically distressed urban area. That means our programs and services run the gamut from basic literacy and English as a Second Language instruction to degree options leading to workforce credentials as well as transferability to Bachelor degree partners. RACC also has a specialty focus on high end employer–centered advanced technology and manufacturing raining offering nationally recognized programs in these areas. Response: We appreciate the comments and value RACC as a key partner in the workforce development system. • Recommend that the Commonwealth Separate the Carl D. Perkins from the State's Combined WIOA Plan. It is unclear what the benefits would be of combining Perkins with the state WIOA plan. Including Perkins

within the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements while at the same time decreasing the amount of funds available to the training providers. At RACC there is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to new overhead or administrative costs will harms students and clients of the workforce system. In addition, the current structure is effective and efficient. At RACC we have strong employer, community and workforce system professionals' involvement with our College's Perkins plan. They are very supportive of Perkins continuing to be a college–based funding source that provides critical services to eligible students. Community colleges have a strong working relationship with the Pennsylvania Department of Education (POE) relative to the efficient use of Perkins funds. There is no discernible need to change what is working well. And lastly the Perkins program is currently being considered for reauthorization by the U.S. Congress. Including Perkins in the Commonwealth's WIOA plan may make it more difficult to comply when reauthorization is complete. Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. It is noted that submission of a state plan is a federal requirement; therefore the commonwealth cannot postpone implementation until a time when federal reauthorization of the Perkins Act is completed. • Recommend that the Commonwealth Separate the KEYS Program from the State's Combined WIOA Plan. RACC has enjoyed success in working with the KEYS target population and has established a strong working relationship with our County's Social Services agencies for referrals and provision of wraparound services that these students often desperately need. As stated above this program is effective with some of our areas' most hard to serve individuals. We have gained approval for training program flexibility that could well be lost if KEYS is rolled into the Commonwealth's WIOA. Our goal is to help those served gain employment in jobs that provide family sustaining wages. Our close ties with employers needing workers in these targeted training programs cannot be duplicated by a more general workforce system that does not have the close working relationships established over time by RACC staff. We know and understand the multiple needs and challenges faced by these students, and our own KEYS staff, well trained and experienced in serving this population, provide the focused and sustained campus attention that cannot be provided elsewhere. To lose any funding or flexibility in supporting the KEYS population will only hinder the program's positive impact and potentially lessen the number of workforce successes. Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program. • Recommend the Commonwealth Leverage the Experience and Expertise of the Community Colleges Rather than Concentrating Funds In and Requiring Decision–Making to Be Run Through the Workforce Investment Boards (WIBS) and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. The Community colleges also have good working relationships with employers in the local community. Our relationships with employers and our on–going communication / interaction with them are reflected in the following: Job placement services for graduates as well as vibrant internships, practicums and clinical experiences for our career programs. Employers' active involvement in / on career program advisory committees. RACC's Board of Trustees and Foundation Board of Directors both represent a cross–section of employers and community leaders who are strong advocates for RACC. A list of over 120 regional employers (from 8 counties) who utilize RACC's Schmidt Training and Technology center for customized programs for incumbent workers, offer internships to students, and are eager to work with its staff on post–program completion student employment. RACC's close working relationships with business and economic development

organizations such as the Berks Business Education Coalition, the Greater Reading Economic Partnership, the Berks WIB and the Greater Reading Chamber of Commerce and Industry. RACC is a strong partner in joint workforce initiatives that stress the need for educational attainment and workforce training beyond high school especially in high demand fields. Response: Community colleges are an important partner in the workforce system. The community colleges do have very good relationships with employers in the local communities that they serve. However, there are large areas of the commonwealth where the community colleges do not have those strong relationships. As such, the commonwealth disagrees that the community colleges can take the place of the LWDBs and PA CareerLink® centers. • RACC's Technical Academy with our County's Two Career and Technology Centers is a Model Program. Our working relationship with both the Berks Career and Technology Center (BCTC) and The Reading Muhlenberg Career and Technology Center (RMCTC) has drawn great praise from regional employers and workforce professionals. A type of honors secondary school program, the Technical Academy allows CTC students in select tech fields like mechatronics engineering, electronic health care records and IT to earn up to 27 RACC college credits toward an Associate degree while still enrolled in high school. This fast track to degree completion in high demand fields is gaining enrollment as it is an example of a sound educational partnership that is cost effective for students and their families. Response: The commonwealth applauds RACC and its partners in creating this partnership. • Recommend that the Commonwealth Use the Governor's Set– Asides for Business Education Partnerships with Community Colleges. RACC's experience and employer relationships make us a natural choice for such funding. We understand the power of coalitions and partnerships, and can build consensus on needed initiatives in an efficient, highly impactful manner. As an example RACC has been a driver of a community campaign designed initially by the Greater Reading Economic Partnership, CAREERSIN2YEARS, that emphasizes the opportunities in advanced manufacturing and related technology fields. Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds. • Recommend that the PA–TIP program be expanded to include the addition of CIP 51 to cover more health care occupations. Discussion in draft plan starting on page 53. Health care occupations are significant to the current and future workforce growth and economic viability of the Commonwealth. Expanding the eligible PA–TIP programs to include the health care industries would provide much–needed financial assistance to students seeking to be employed in these critical occupations. Response: PA–TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request. • In conclusion while RACC supports the Commonwealth having a highly collaborative and comprehensive workforce system, the WIOA as proposed has several problems that could, if implemented, decrease flexibility, increase administrative barriers and in the end prove to be less effective than what is now in place. Encouraging cooperation is better than forcing dollars to be allocated through the WIBs /CareerLinks putting them in the role of gatekeeper. I urge the commonwealth to utilize the expertise of its community colleges and not to tie our hands. Our commitment to educational attainment and workforce development tied to our local community needs is unparalleled. Response: We appreciate the comments. There is value to local flexibility but that flexibility must be exercised in support of the Governor's workforce goals and, therefore, must be subject to some state–imposed rules. Rosalee Pituch of Rebecca M. Arthurs Memorial Library commented: I firmly believe libraries are in a perfect position to play an integral role in serving employers, employees, students, and all learners seeking to enter or re–enter the workforce. Libraries are open more hours, are located in most communities removing the barrier of transportation, serve all age groups, and provide professionally trained staff to assist anyone using the library who needs help with technology, language skills, literacy, or the myriad of issues that arise around workforce development. This list is not inclusive. There are so many more services that can be provided through libraries to the many youth, job seekers, employers and more who need

help. I am writing from a public library perspective but libraries of all types should be included in any plans made to shape a stronger, more productive workforce which benefits all of us through a stronger Pennsylvania economy. Budget and resources are always the issues. Libraries naturally offer a higher return on investment. The resources provided in the libraries across the Commonwealth will make all Workforce Development plans better. Please include libraries in these plans. On a local level this library has partnered many times over the years with Workforce Development. Response: We appreciate the comments about the library's convenient location and hours, and the services already provided to individual jobseekers and businesses. We made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. Linda Drummond of the Rehabilitation and Community Providers Association offered multiple comments to include: • This is a thorough state unified plan that follows the federal WIOA law directives and requirements. The plan includes the coordination of cross–systems responsibilities and services to assist individuals with a variety of disabilities to potentially obtain competitive employment; These included the Departments of Education, Human Services, and Labor and Industry, as well as the relevant offices in each department, such as Office of Developmental Programs, Office of Adult Education, Office of Special Education. The inclusion of Customized Employment and Discovery will be an asset to assist the most challenged to prepare for employment with addressing their interests, skills and abilities. It is helpful to see the WIOA required steps that L&I and OVR must take to assure options are available and intense planning is coordinated to assist with employment. Response: DHS and OVR appreciate this comment and input. Discovery and Customized Employment services will continue to evolve in Pennsylvania. As this is a new service, collaboration and alignment in the various state agencies will be important for the implementation and utilization of such services. • As RCPA represents many agencies that provide OVR funded services, our concern is that policies need to assure that options exist for those unsuccessful with competitive employment efforts; These individuals need to be provided with other daily options which may include subminimum wage employment in work centers. Other options may need to be developed for these individuals that will address continued development of their skills and abilities for potential future employment, focus on daily activities to promote learning, daily living skills, plus opportunities for community inclusion and interactions with others. Response: We appreciate the comment. DHS' Medicaid HCBS waivers provide a number of employment and other community–based services for individuals with a disability. All services provided via an HCBS waiver must comply with federal CMS rules in terms of what is considered home and community based versus what is considered segregated and isolating. We note that we are awaiting the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. WIOA and the commonwealth's Employment First policy do not preclude alternative options for those who are unsuccessful in competitive integrated employment but do prevent people with disabilities from being placed in alternative settings without receiving counseling about competitive integrated employment opportunities. • Also, for many that are employed, it may be only part–time employment and this unified plan with cross–systems collaboration needs to address other daily options for the times that are not spent on the job. Again these options need to address further skill development and community inclusive activities. Response: We appreciate the comment. Nothing in the state plan prohibits placement into part–time employment where appropriate. • The relevant state departments that are a component of this WIOA Plan need to work with the existing services such as sheltered work centers which are a vital part of the state's manufacturing system providing labor support for businesses and employment for those that have many challenges which impact their ability to obtain or retain community integrated employment. This cooperation will allow the systems to continue needed services, and provide a variety of opportunities for individuals. Response: We appreciate the comment and support engaging service providers for persons with disabilities and other stakeholders as WIOA implementation continues. Dennis Wilke of Rosedale Technical College offered multiple comments to include: • In the description of the Perkins State Plan for the CTE Perkins Grant program, I am concerned about the Evaluation and Performance Measurement

Indicators. Under the current Perkins plan and in the prior versions, some of the performance indicators for post–secondary institutions have been inaccurate in evaluating performance. This WOIA plan document refers to the Perkins State Plan for details of the performance indicators, but does not describe them in any detail. However, these indicators really must be improved with the next version of the Perkins State Plan and so I thought my comments here would be appropriate. For example, the 2 indicators referring to non–traditional post–secondary student participation and completion use numerical targets that are averages across all CIP codes resulting in dramatically unrealistic performance targets. For example, the participation and completion goals for female electrician students has been approximately 20%. When the BLS statistics show that less than 1.5% of all electricians currently working are female, it is quite unreasonable to expect a school to achieve 20% female students in its population. Since our college teaches primarily programs that are similar in nature to these statistics, it is completely beyond our control to achieve these arbitrary performance indicator goals. Our college non–traditional population is typically a very admirable level of approximately 3 times the normal non–traditional workforce participation rate, but we will never be able to hit the Perkins goals that have been used in the past. That is demoralizing and does not accurately reflect the success we've had in promoting non–traditional careers. Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. The federal Perkins regulations mandate the current performance measurement indicators and are not able to be changed until Perkins is reauthorized. Perkins regulation did allow for local negotiations. Rosedale Technical College renegotiated its level of performance during the 2014–15 grant year. The state provides technical assistance and professional development to all Perkins recipients. The focus of the Department assistance is to assist Perkins recipients in meeting low performance. Technical assistance included micro–message workshops. Rosedale is invited to participate in the technical assistance activities. Rosedale Technical College has not received a sanction letter for not meeting the nontraditional indicators for 3 consecutive years. • The WOIA describes the Benefit and Service Approval process for the administration of TAA retraining funds. The current process for this program does not fully serve the best interests of the eligible participants. I know of multiple specific instances where an eligible participant was denied the opportunity to attend a training program that they knew would best serve their need to obtain job training. The current rules provide only for the lowest cost program within a certain mile radius to be approved without regard to the participants knowledge of and confidence in the quality of the programs and the best fit for that participant. Why would there not at least be an option for the participant to be awarded the amount of the lowest cost program which could be applied at the institution of the participants choice? In one case, a participant decided not to attend any job training program because he didn't want to attend the approved program that was 48 miles away from his home, while his preferred program was less than 10 miles away. The way these program approval rules are being applied do not adequately serve the participants best interests. Allowing a capped award to be somewhat portable in reflecting the participants preferences would cost the same amount but would result in higher performance. Program completion rates would be higher if the participant had more say in which program they were able to take, subject to Merit Staff review of course. Response: Training Available at Reasonable Cost. The regulations at 20 CFR 617.22(a)(6) require that training be, among other things, at a reasonable cost. Further, approval requires that the training be at the lowest reasonable cost (20 CFR 617.22(b)). In particular, training at a facility outside the workers normal commuting area, as determined under the state law (20 CFR 617.3(k)) that involves transportation (or subsistence) costs which add substantially to the total costs of training must not be approved if other appropriate training is available at a lower cost within the

commuting area. When training, substantially similar in quality, content and results, is offered at more than one training provider, only the lowest cost training may be approved (20 CFR 617.22(a)(6)(iii) (b)). A state must disapprove a training program if the training is in an occupational area which requires an extraordinarily high skill level and for which the total costs of the training are substantially higher than the costs of other training which is suitable for the worker (20 CFR 617.22(b)). Therefore, computation of a transportation payment is an important part of the determination of whether a particular training program is available at a reasonable cost. The 50 mile radius is a Labor & Industry decision based on an appropriate daily commuting distance. In the case where a participant decided not to attend any job training program, we take into consideration many variables and must adhere to the Trade Act of 1974, as amended, with our decisions. A participant has the right to appeal any decision that is made by Trade Act Services. USDOL provides L&I with federal funds in the form of a grant, and L&I executes Trade Master Agreements to disburse such grant monies with institutions for the provision of TAA training and services. Funds are not paid directly to participants. Heather J. Wakefield of Saegertown Area Library commented: I find the ideas of the PA Workforce Development Plan potentially beneficial and applaud these efforts to aid individuals struggling to find jobs that allow a good standard of life. Utilizing libraries could increase the effectiveness of these programs. As the director of a small, rural library, I frequently interact with job seekers who do not have internet access at home and those who need assistance with finding and applying for jobs. Many lack computer, communication, and/or other skills that would make them desirable employees. With limited staff, we find meeting all their needs can be challenging. However, we can identify individuals who could benefit from additional skills courses, internships, and apprenticeships and help them connect to these services. We could set up a job resources space with information on internships and classes. We could also host classes, especially for those with transportation issues who can walk to our library but would find going to a career or other agency difficult. (We currently have no career or education center in our town, so people must go to the nearest city for these services.) We have had a resume workshop and basic internet classes and will continue to schedule more of both, but we would be thrilled to expand what is available if we have someone willing to offer instruction. We have had a GED class come to the library for lessons on information literacy skills. We also welcome the opportunity to collaborate with local businesses offering apprenticeships and internships by connecting them with job seekers. We have already developed working relationships with many local businesses, so this would be a natural, mutually beneficial expansion of these connections. Thank you in advance for your consideration of my comments. I know libraries can continue to be a vital resource for job seekers and businesses as we strive to build our economy and communities. I wish you success in implementing these programs. Response: We appreciate your comments about the plan and the service that the library provides to jobseekers and employers in Pennsylvania's small and rural communities and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. Cathi Alloway of Schlow Centre Region Library offered multiple comments to include: • I have a few quick comments on the Consolidated Workforce Development Plan regarding public libraries. I attended meetings last year of a county taskforce looking at workforce development in our area, especially for skilled labor. I am dismayed that there is no mention of the role public libraries can play in workforce development in PA. We already have public computers and resources for job–seekers, test proctoring, and other resources for students, including non–traditional and skilled trades. Public computing, in particular, is critical. Studies from the Pew Research Center have documented that low–income, low–education citizens tend only to have a smartphone for Internet access. Completing job applications and income tax forms is simply not something that can be completed on a cell phone, as we see daily in the libraries. Our libraries see many, many people daily using resources for career growth and development. There is an opportunity on page 11, section 2.8, which could be revised as follows: The commonwealth will continue to foster relationships between the workforce development, post–secondary, secondary education, and public library systems to ensure system alignment, programs of study and services that support job seeker and employment needs, and

leveraging of resources. Response: We appreciate the comments about libraries that offer computer training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. • PA nonprofits, including libraries, continue to lack funds for staff and can provide wonderful opportunities for work training. My library is fortunate in that we have PHEAA work–study students and an "Experience Works" trainee. We are offering them well–rounded, robust experiences, as they are integral to our daily operations, given our current under–staffed status. Prioritizing placement of students in programs, such as those listed on page 14, section 3.8, in nonprofits and libraries, would be appropriate. Thanks for the opportunity to provide input. I really do hope that there is some mention of the essential role public libraries play in this process. Response: We appreciate your comments about the value of work–study and earning work experience through small nonprofits such as libraries. We believe the types of programs you are suggested are covered by the "other partner programs" language in Goal 3.8. Judith Olmstead of Scobell Company, Inc. offered multiple comments to include: • Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas) While there is certainly value to up–skilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment) Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify) NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of

comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan a definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table) While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or law wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25) It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29) This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. South Central PA Works offered multiple comments to include: • South Central Pa Works (The South Central Workforce Development Board) strongly supports the Governor’s vision and goals for our public workforce development system as outlined in the Commonwealth’s proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. It is our intent to make this vision a reality for the Commonwealth of Pennsylvania. As a regional workforce development board

representing 8 Counties (York, Adams, Franklin, Dauphin, Cumberland, Lebanon, Perry & Juniata) in South Central Pa, we are leading the development of an innovative, employer–driven workforce development system to support the economic growth of our region, using the resources and flexibility found within WIOA and elsewhere to remain nimble and innovative in support of our diverse mix of business and jobseeker customers. With this in mind, we respectfully submit the following comments: Response: We appreciate the comment in support of the Governor's vision and goals. • Goal 2 – Invest in Talent & Skills for Targeted Industries in Strategic Partnership with Employers & Education Institutions (pg. 10) We recommend providing additional clarification on the following with respect to the calculation of the proposed benchmarks for WIOA Title I funding: o Exclude dislocated workers from the training expenditure calculation, as their eligibility is not based upon barriers. o Exclude youth from the training expenditure calculation as well, as all youth must have a legislative barrier (defined under WIOA) to be able to participate in a WIOA funded program. o Include all allowable training activities under WIOA Section 134 (WIOA pg. 191) as well as work experience in calculating training expenditures. o Include PELL, scholarships and other forms of financial aid available to participants. o Include additional one–stop partner program training expenditures for participants who are dually enrolled in another one–stop partner program (Title II, OVR, etc.) and WIOA as defined within the Combined Plan. o Include the costs of assessment, case management, registration, books, lab fees, required uniforms and other costs necessary for participants to enroll in and successfully complete our training programs. • We recommend with respect to the goal of expending 70% of Title I funding on individuals with barriers that additional clarification to this section be considered as described below: o Exclude dislocated workers from the calculation, as their eligibility is not based upon barriers. o Include our local board definition of not earning a "self–sufficient" wage as one of the barriers Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • WIOA Performance Goals for Core Programs (pg. 31) While we are still transitioning to WIOA and participants enrolled prior to publication of the final negotiated measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the State during its last year of performance under the Workforce Investment Act (WIA). This suggestion is premised upon the following: o The parameters for the calculation of the measures have not yet been issued by the USDOL and will likely not be issued until after the State plan is due. o There are 3 new adult/dislocated worker measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance. o There are 4 new youth measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance. o The method for calculation of all the WIOA measures will not be the same as under previous legislation. o Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. We understand that under WIOA the USDOL will be working on ways to improve reporting; however, as we enter into WIOA, we will still be working under the current reporting system. o The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA Sec. 116). We respectfully submit that the Commonwealth set a lower baseline for performance in the plan while still encouraging and incentivizing our area (and others) to meet the Governor's thresholds. In doing we and the Commonwealth can strive toward the Governor's goals without placing undue pressure and risk on the State and Local workforce development system. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Priority of Service for Recipients of Public Assistance, Other Low–Income Individuals, and Individuals Who are Basic Skills Deficient (pg. 67) We recommend the Commonwealth's plan recognize individuals with barriers may not always have the necessary

qualifications, as required by WIOA Section 134 (WIOA pg. 191) to succeed in training without further assistance from another workforce development system partner program (Title II Adult Literacy, OVR, Community Based Social Service Agency, etc.). We see greater success when our CareerLink teams can assess, identify, and refer these individuals to the additional assistance they may require before enrolling in our training program, improving the probability of a successful outcome for our participants. Similar to our prior comments with regards to the calculation of the proposed WIOA Title I benchmarks, we respectfully request the State to consider the following clarifications with respect to "priority of services": o Exclude dislocated workers, as their eligibility is not based upon barriers. o Include those individuals who meet our local board definition of not earning a "self–sufficient" wage as one of the barriers, or that this individual be considered low–income, thereby entitling them to a priority of service. Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. Senator Lisa Baker commented: I am forwarding concerns relayed to me by various involved groups regarding Pennsylvania's WIOA Combined State Plan, 2016–2020. While those I have spoken with support increased accountability among service providers, there is broad–based concern that a mandate requiring 50% of Title I funding be spent on training (and that 70% of those funds be spent on individuals with barriers to employment) unfairly restricts the ability of workforce investment boards to appropriately expend dollars. Instead they are seeking additional options to allow monies to be tailored to local needs. I ask that you seriously consider developing alternative benchmarks that would allow for the flexibility required. Of course, I stand ready to assist in any way possible. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. Kelly Davis of Seneca Highlands Intermediate Unit 9 commented: How will effectiveness in serving employers be measured among all groups, but particularly adult education providers? Response: Effectiveness in serving employers is a federally mandated performance measure. Additional guidance on how it will be measured will be provided upon release of the final WIOA regulations by the federal government. Tony Sarmiento of Senior Service America, Inc. offered multiple comments to include: • Senior Service America, Inc. (SSAI) appreciates this opportunity to submit comments regarding the draft Pennsylvania WIOA Combined State Plan. SSAI currently operates the Senior Community Service Employment Program (SCSEP) in Pennsylvania and 15 other states as one of USDOL's national grantees. For more than 40 years, we have worked closely with our four subgrantees (Tri–County Workforce Investment Board, Greater Erie Community Action Agency, Lawrence County Community Action Partnership and the Armstrong Area Agency on Aging) to help low–income unemployed older Pennsylvanians return to the workforce. Our national network of 80 subgrantees includes workforce development agencies, area agencies on aging, faith–based organizations, and community colleges, as well as community action agencies and other nonprofit organizations. With our network, SSAI is firmly committed to improving the employment, health, and well–being of low–income older Americans by connecting them to resources available under the Workforce Innovation and Opportunities Act, the Older Americans Act, and other programs. In our view, Pennsylvania's draft WIOA Combined State Plan (dated 12/28/15), particularly pages 204–230 related to SCSEP, contains several praiseworthy elements that should assure older Pennsylvanians that the State of Pennsylvania has not forgotten them. Especially noteworthy is the Pennsylvania Department of Aging's partnership with the Pennsylvania Home Care Association to improve the skills of current and future workers as noted on page 48 of the Combined Plan. Response: We appreciate the comment in support of our planned actions. • But like many states SSAI currently serves, Pennsylvania faces significant challenges as well as opportunities to serve its older workers under the new WIOA. As stated on pages 20 and 21 of the draft Pennsylvania WIOA Combined State Plan, the proportion of the Pennsylvania population age 55 and older is expected to increase. In fact, the U.S. Census Bureau estimates that 28 percent of Pennsylvania's population will be over 60 by the year 2030, which represents an increase of close to 35% from 2010 (Source: U.S. Administration on Aging Projected Future Growth of the Aging

Population). Under WIA, our national workforce development system significantly underserved older workers at a time when they increased as a proportion of the total workforce and became increasingly diverse as a population in need of workforce development services. As early as 2003, GAO reported that some of WIA's performance measures created disincentives for program administrators to provide older workers from receiving more in–depth WIA services. Developing a combined state plan under WIOA provides Pennsylvania with an opportunity to correct this systemic bias against serving the employment and training needs of its older workers, many of whom continue to struggle and suffer since the Great Recession. In this spirit, we offer the following concerns and recommendations. Response: We appreciate the comment in support of our planned actions. • Recognize in the Combined Plan that older workers will greatly comprise the state's "most in need and hardest to serve" (on page 7) given the projected growth in Pennsylvanians 60+ (see pages 20–21). Response: We appreciate the comment and have added language to page 20 of the plan. • Include additional information about SCSEP. SCSEP remains the largest federal workforce development program targeted to serve older workers. The Government Accountability Office has identified SCSEP as one of only three federal workforce programs with no overlap or duplication. Including this additional information would promote greater awareness of SCSEP in the workforce development community. This additional information could be included in: o Section 2.9 on pages 11 and 12 regarding those who are low–income, recipients of public assistance, skills deficient and possess barriers to employment; o On page 20 of the Combined Plan under paragraph regarding the state's population is growing older; o On page 21 of the Combined Plan in the paragraph regarding those who need to work and thus do not plan to retire; o On page 29 as an example (such as TANF and SNAP) in the last bullet regarding integration and alignment of workforce program; and o On page 41, this additional information could be included in an expanded description of the bullet noting the State's Area Agencies on Aging and National Grantees provision of SCSEP services. Response: We appreciate the comment and have added some of the recommended language on page 41. • Promote and support stronger SCSEP – One Stop collaboration. SCSEP has been a mandatory partner at One Stop Centers under both WIA and WIOA and are actively engaged in improving outcomes for older workers. We are concerned about the utilization of the SCSEP funds to pay for One Stop infrastructure costs, especially since SCSEP, by law, can expend very little on administrative and other program costs (The Older Americans Act requires that grantees expend at least 75% of their program costs on participant wages and fringe benefits). The Combined Plan makes no mention of the proposed cost sharing the draft WIOA regulations may allow. Therefore, we recommend that Pennsylvania allow that the costs of SCSEP participants/enrollees assigned to the One Stop (as noted page 41 of the Combined Plan be counted toward One Stop infrastructure cost allocation and that the costs be proportionate. This would minimize the potentially negative impact on SCSEP – One Stop collaboration as well as reflect the true value being provided by SCSEP to the One Stop. Response: We appreciate the comment and will consider this recommendation in a separate policy document to the PA CareerLink® centers. • Serve the wide diversity of older workers and their needs more effectively through stronger SCSEP–One Stop MOUs. An effective MOU should include a method for referring participants between the One Stop operators and partner programs, including those programs that serve subpopulations with barriers to employment. Too often under WIA in many states, One Stops automatically referred all older job seekers to the SCSEP representative at the One Stop for services without screening for the individual's specific needs. SSAI recommends on pages 29–30 of the Combined Plan that the MOU between Local Boards and required programs define a process to ensure that individuals are screened to determine the best set of services to receive at the One Stop center, as older individuals' employment needs vary based on their individual circumstances and may require assistance from either WIOA Adult services or SCSEP or both. Response: We appreciate the comment and will consider this recommendation in a separate policy document to the PA CareerLink® centers.

• Invest in the skills and knowledge of One Stop front line staff to assist the diversity of older workers. Serving older workers has never been a priority of the public workforce system, especially since the end of JTPA. SCSEP is the notable exception, but it is targeted to serve a specific subpopulation of older workers: the poor and near poor. To achieve the vision of a truly universal system, front line staff of the American Job Centers/One Stops would benefit greatly to be trained to provide staff–assisted services to an older population that is larger and more diverse in their workforce development needs than the SCSEP–eligible population. We recommend that Pennsylvania Department of Labor and Industry collaborate with the Pennsylvania Department of Aging to develop and implement ongoing skills development for the staff of both agencies to cross–train in both aging and workforce development in support of the Combined Plan's recognition that well–trained staff ensures successful cross–program alignment (page 30). Response: We appreciate the comment and will consider this recommendation in future discussions between the PDA and L&I. • Collect and report more detailed data to ensure that older Pennsylvanians are appropriately served under WIOA. We are concerned that the proposed WIOA regulations' implementation of the earnings indicator performance measure will continue to discourage service to older job seekers since many older workers work part–time by preference or involuntarily. Since only total wages are reported for each exited participant, there is no provision for reporting the wages expressed as dollars per hour to more accurately reflect outcomes. With regard to the Assessment of Programs and One Stop Partners on page 57, we recommend that Pennsylvania revise reporting to wages per hour rather than total wages. Response: We appreciate the comment and will consider this recommendation. • SCSEP participants are good candidates for jobs. We appreciate the acknowledgment on page 205 of the Combined Plan that because more than 60% of current SCSEP participants have at least a high school diploma, these are a strong match for the employment projections found in Appendix X (page 253). The positions listed in Appendix X seem more appropriate for a larger number of SCSEP participants than the occupation of School or Employee Bus Transportation listed on page 204. Many SCSEP participants, due to eye–sight issues related to aging, are limited in their ability to drive. Response: We appreciate and understand your comment. However, we are aware of school bus companies that actively recruit retirees for part–time bus driver positions. James Coley of Southern Alleghenies Planning & Development Commission offered multiple comments to include: • The plan opens with an outline of five goals. In goal 3 Increase Work–Based Learning Opportunities for Youth on page 13 in that goal's subsection 3.1, it states that "recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (ex. Self–attestation) to help local area staff successfully meet the needs of those individuals". On page 86 of the plan, it restates the following intent" to ease burdens on both applicants and providers and serve out–of–school youth who are most in need, the commonwealth will allow self–attestation for out–of–school youth for the purpose of WIOA eligibility determination". This intent is commendable but is inconsistent with their guidelines to local areas. On December 23, 2015, the L&I issued Workforce System Guidance No.04–2015, Subject– Self–Certification and Telephone Document Inspection Verification. In that document on page 4 it states that "Neither applicant statements nor self–attestations may be used for family size/family income criteria in determining eligibility." This is not only inconsistent with the state plan's intent as previously stated but also is inconsistent with the US Dept. of Labor's traditional allowance of the use of these forms under WIA. The guidance and plan were both generated by the commonwealth and coexist in violation of each other. The plan will take effect July 1, 2016, however, the referenced guidance has been in effect since Dec, 23 of last year. These youth that the system has targeted for services tend to lead a non–traditional nomadic life style. As a result, traditional document sources are difficult to obtain. The use of these banned forms was very helpful and used often in bridging this issue. This guidance statement has created an unnecessary burden on local area WIOA operations and will result in an increased number of recruited out–of–school youth not completing the enrollment process and will reduce the local area's ability to meet enrollment and expenditure level requirements. This issue needs immediate attention. Response: To ease burdens on both applicants

and providers and serve out–of–school youth who are most in need, the commonwealth allows for self–attestation. The guidance issued by the commonwealth is consistent with the state plan's intent. Such guidance does not allow self–attestation as it relates to income, which is consistent with the policy direction of other core partners in this plan. L&I is collaborating with its partners to create other means for verifying income or the lack of such income for eligibility purposes. • Later on that same page, the state recognizes the challenges in increased emphasis in serving OSY when it states that the "commonwealth will work closely with each LWDB to negotiate levels of performance that reflect the needs and challenges of the new service population. In this way, local areas will not be penalized for enrolling high need and difficult to serve individuals who are the focus of WIOA youth activities." In addition on page 14 under subsection 3.5 of that goal, it states that "The commonwealth will work with the US Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out of school youth being served within the commonwealth and in each area." In practice, there was a past process that was used in a previous DOL funded workforce development program that accomplished this. It was called the regression model. Each targeted hard to serve client population group was weighted based upon its drag on performance. Each local area's initial performance level was negotiated on general conditions in the local area, then at the conclusion of the program year, the regression model was calculated. The initial negotiated performance level was then adjusted based upon the actual enrollment levels of the hard to serve populations. Since this was based upon hard to serve client groups and not on school status, the entire mix of clients affected the final performance measure. If emphasis on the impact of disconnected out of school youth is desired, the weighting could be adjusted accordingly. Response: We appreciate your comment and will work closely with the US Departments of Labor and Education to ensure the statistical model reflects actual conditions experienced and the characteristics of participants. • The first goal is Establish Career Pathways. On page 10 in subsection 1.9 of that goal it states that "the Commonwealth will establish statewide and regional lists of industry –recognized credentials. The lists will include academic credentials as well as credentials demonstrating job readiness and the attainment of "soft skills" through workforce preparation activities". This last statement is especially critical for youth/young adults who lack or have limited work experience. A credential demonstrating job readiness and the attainment of "soft skills" should include an employer evaluation process to substantiate the work readiness of the individual. Evaluations by an employer in a work environment based upon employer work readiness standards should be one basis for documentation of work readiness attainment. Correspondingly, individuals which achieve the attainment of work readiness and soft skills should receive credit toward the credential attainment performance measure. This credit has not always been recognized in the past. Response: The commonwealth is open to consideration of all suggestions for the development of industry–recognized credentials. Debbi Prosser of Southern Alleghenies Planning & Development Commission offered multiple comments to include: • Good afternoon, I am Debbi Prosser and I have the pleasure of serving as the Regional Coordinator for the Southern Alleghenies PREP Network. As such I have the opportunity to work with economic, community and workforce development professionals as we join forces to assist the businesses in the 6 county Southern Alleghenies Region to prosper and grow. First let me say that we work together well in the Southern Alleghenies Region. The Workforce Development staffs and CareerLink staffs were included in our PREP Network from day 1. We didn't need to be coached or incentivized to build a team that included workforce development and economic development professionals because that is routine business for us. Workforce Development is at the heart of many of our discussions in regard to the current and future state of our region. So I am pleased that the Combined Plan has been presented for comment. In reading through the plan I was impressed by: o The over arching goals o The comprehensive approach o The recognition that multiple parties will need to be mobilized to accomplish the objectives. o And the desire to more fully engage the business community through industry partnerships and in policy positions. Response: We thank the commenter for highlighting the

positives she sees in the State Plan. • I am not qualified to speak to some of the more specific workforce and training strategies but I have to admit that the plan does raise a few concerns for me. The first is the impression that we are creating a “one shoe fits all” scenario. This concerns me because it assumes that all regions in the commonwealth have the same needs and function in the same manner and I have not found that to be the case. Urban centers have very different economic conditions than rural areas and limiting the ability of the workforce system to be responsive the customer’s needs in our region based on statewide objectives would not be to our benefit. My experience in economic develop is that the best efforts are based on the ability to be agile so that we can be responsive to the customer’s ever changing needs. When provided Jobs 1st funding we learned a few lessons through the implementation of that program. One of those lessons was that the workforce development system was far less agile due to the regulatory environment than the economic development community is. I understand that regulations are set upon us from the US Government but I would ask that as the Commonwealth finalizes this plan that you consider what additional regulations are being placed on the PA workforce system by the Commonwealth. I would suggest that any additional regulations that are not mandates from Washington will likely not serve us well, and will inhibit our ability to be agile in addressing our [the paragraph ends here] Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor’s priorities are achieved. • Lastly, I would like to speak to the mandates for the Workforce Development Boards that are included in the plan regarding investments in post–secondary education for job seekers. I certainly recognize the competitive advantage that PA would have if we would be able to promote that we have an authentic well trained workforce. Conveniently, our Workforce Development Board has always placed great emphasis on raising the educational attainment levels of our residents through training and has sought out funding for incumbent worker training on a routine basis. But the mandates the will tie them to arbitrary and significant training expenditure benchmarks will force them to redirect resources from other very valuable and productive services for both the job seekers and employers. I would hope that the plan can be reworked to provide more flexibility for the regions. We understand better than anyone the needs of our employer community and job seekers. If the commonwealth would allow us to work closely with the Workforce Development Board and the CareerLinks to support training that makes sense and addresses the needs of our employers rather than be tied to specific expenditure benchmarks I believe our region would be much better served. Thank you for the opportunity to provide comment on this very important plan. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. Stephen Howsare of Southern Alleghenies Planning & Development Commission commented: The state plan contains multiple references to the increased role of technology in service delivery and enhancing the workforce system access through its use. We urge caution when you consider greater reliance on technology to serve our customers. While roughly 90% of Pennsylvanians have access to high speed, wired broadband internet, the Southern Alleghenies region falls far short of that level of connectivity needed to truly utilize technology in service delivery. In fact, drive just a few miles from this Career & Technology Center and you won’t be able to use a cellular telephone let alone access a high speed internet connection. Furthermore our customers, especially those with significant barriers to employment, do not have the skills needed to even undertake what you make consider a simple task– enrolling on Job Gateway. The jobseekers in our region tend to be older with no post–secondary education. Our Introduction to Computer workshops are filled with often filled with those who have never sat in front of a monitor, turned on a CPU, or moved a mouse. Once they’ve learned the basics, they return to our CareerLinks to use the computers to access Job Gateway and, with assistance from our career counselors, continue with their job search activities. Likewise, those jobseekers with some degree of computer literacy utilize our CareerLink computers to connect to Job Gateway. Many have no other access to technology due to the cost associated with maintaining home internet connections. In summary – It would be a tremendous miscalculation on the part of the state workforce leaders to

assume that our customers: 1. Have access to the requisite levels of connectivity needed utilize a workforce system that relies greatly on technology for delivering services 2. Have the requisite level of computer literacy to utilize a system that deploys services through the use of technology You would however be correct in acknowledging that the CareerLink offices and their trained staff are vital resources to our communities and the jobseekers and employers they serve. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Martin Culp of Southern Alleghenies Workforce Development Board offered multiple comments to include: • para. 4.4 – The commonwealth says it will specifically require LWDBs to provide funding to Industry partnerships. We strongly have and will continue to support industry partnerships but we need clarification on the topic. Does the commonwealth intend to establish any parameters for requiring funding to Industry Partnerships? Is it a specific percentage? Can it be in kind? Depending on the local economic conditions, employer demand, and the availability of other funding sources, we recommend that the LWDB be given the discretion to determine the amount and form of IP funding that it can support. Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training. • para. 2 – The commonwealth indicates that Local Workforce Development Boards and PA CareerLink® centers will be required to use between 5% and 10% of their funds to provide transitional jobs, as permitted under section 134(d)(5) of WIOA. Training and Employment Guidance Letter 3–15 defines transitional jobs as subsidized time–limited work experiences for individuals with barriers, inconsistent work histories, and the chronically unemployed. When employers interview and hire, they have an expectation that the employee will quickly become a productive member of their workforce and develop into a long term employee. Has the state considered the impact on the employers (i.e. workers comp/UC/lost production time), by requiring them to hire individuals without the necessary skills and that have no expectation of continued employment beyond the work experience? Please consider not putting a percentage target on transitional jobs and allow Local Workforce Development Boards and CareerLink® counselors to support transitional jobs on a case by case basis depending on the needs of the participant and employer availability. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Employer participation in the transitional jobs program will be voluntary. Susan Whisler of Southern Alleghenies Workforce Development Board commented: My name is Susan Whisler and I serve as the director of the Southern Alleghenies Workforce Development Board. On behalf of board thank you for opportunity to provide input. We are encouraged that the plan takes a more comprehensive view of workforce development– that it’s not solely the responsibility of Title I or Wagner Peyser. Beginning with the first page of narrative, there are numerous references to the workforce system– a comprehensive system that “aligns workforce priorities across multiple partners to ensure we are creating a skilled workforce.” It identifies as a core challenge “workforce programs that operate in their own individual silos rather then being integrated into an overall system.” It urges cross–program funding and programmatic integration yet the plan establishes training expenditure benchmarks for only Title I. Instead we urge you to consider setting broader benchmarks that encompass multiple programs and actually encourage cross–program/cross department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. Furthermore we urge the state to broaden the definition of what constitutes a training expenditure to include National Emergency Grants, Rapid Response, Trade, and associated staff costs, not unlike the stance taken by DOL in defining what constitutes work experience. The Southern Alleghenies Workforce Board has long been a proponent of skills training. Even though we have seen our Title I funding reduced by some 40% over the past ten years, the board still allocates roughly 20% of its

Title I dollars, 100% of its Rapid Response funding, and over 95% of the funding available through special National Emergency Grants in support of ITAs and OJTs. We offer significant financial assistance to our jobseekers yet every year training dollars go unspent. Many tell us that they need to return to the workforce as soon as possible– they can't spend the time in school. Also, many of the open jobs in our region do not require a credential but rather a good work ethic and clean record. If the proposed Title I training benchmarks and related requirements remain as outlined in the plan, it has the potential to dismantle an efficient and effective local workforce system. Yes, we can direct 30, 40 & 50% of our Title I dollars to training but at what cost? To comply with these benchmarks, funding will have to be redirected away from service provision. This will mean fewer career planners and business service representatives available to help the thousands of jobseekers and employers who need our assistance and we will be forced to reduce the number of sites where our customers can access services. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. Bill Findley of Southern Alleghenies Workforce Development Board commented: Let me begin by saying that each labor market region across the state is uniquely different. By that I mean the industry makeup of an area, the types of jobs available, the unemployment situation, and the ability to meet the changing demands of the economy. Across this region a commitment to the proposed training benchmarks cannot be supported by the economies across the region. Labor market numbers that measure projected job growth through 2022 tell us that an overall increase through this period is comparatively small with the majority of the increases confined to the service producing industries where training needs are minimal. Overall job levels are projected to increase by 6%. Another resource that speaks to this question is the listing of high priority occupations Here we find basically the same situation. Growth in occupations where little training is called for. In summary, I encourage you to take a closer look at jobs needed to meet local industry needs. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas in meeting the targets. We currently examine local–area job needs in determining which occupations are on the list of high–priority occupations, and we will continue to do so. Susan Whisler of Southern Alleghenies Workforce Development Board offered multiple comments to include: • The Southern Alleghenies Workforce Development Board (SAWDB) supports the comprehensive approach taken in the development of the state plan and the Governor's goals and objectives designed to create a strong and skilled workforce and a public system that meets the needs of employers and job seekers. The SAWDB respectfully submits that to achieve the Governor's objectives, consideration be given to incorporating the flexibility allowed and encouraged by the WIOA. Pennsylvania is a very diverse state and this flexibility will enable boards like the Southern Alleghenies to be responsive to the needs of our largely rural job seekers and employers. Thank you for the opportunity to provide comments; they are offered with respect to the areas identified below. Response: We appreciate the comment in support of the comprehensive approach taken in the plan. We note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. • Training Benchmarks (WIOA Plan 2.1, p. 10) and Priority of Service (WIOA Plan p. 67): We request additional clarification as described below be considered with respect to Title I training expenditure goals: 1. Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent but it is not clear in the language of the plan. 2. Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA–funded program. We believe this to be the intent, but it is not clear in the language of the plan. 3. Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mirroring how the 75% out–of–school youth minimum expenditure requirements are calculated. 4. Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures. 5. Include PELL, scholarships and other forms of financial aid to offset the Title I training target. 6. Include training conducted under other funding, including but not limited to Trade Act, American Apprenticeship, H1–

B, Rapid Response Additional Assistance, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target. 7. Include one–stop partner program training expenditures for participants dual enrolled in the one–stop partner program and WIOA. We believe this to be the intent but a statement to that effect would make the section clearer. 8. Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. 9. Include the cost of registration, books, lab fees and required uniforms. It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below: 1. Exclude dislocated workers from the calculation as their eligibility is not based upon barriers. 2. Include the local board definition of not earning a “self–sufficient” wage as one of the barriers. It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary skills, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or stabilizing social service assistance. PA CareerLink staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. We also note that administrative funds will not be included when calculating the training targets. • The commonwealth, LWDBs and PA CareerLink® centers shall provide priority for Title I individualized career services and training services, as detailed below, to: (i) recipients of public assistance; (ii) other low–income individuals; and (iii) individuals who are basic skills deficient. (P. 67) Comment: Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”: 1. Exclude dislocated workers as their eligibility is not based upon barriers. 2. Include those individuals who fit in the local board definition of not earning a “self sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service. 3. Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons. Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis. • Performance Measures on p. 31 The Southern Alleghenies Workforce Development Board and its Title I providers are committed to high performance and will work to exceed the baselines that will be negotiated by the state and which are contained in the draft plan. Because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following: 1. The parameters for the calculation of the measures have not yet been issued by the USDOL and will not be issued until after the submission deadline for the state plan. 2. There are 3 new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance. 3. There are 4 new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance. 4. The method for calculation of all the WIOA measures will not be the same as under previous legislation. 5. Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor is working on how to improve reporting. However, we are still working under

the current reporting system. 6. The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)). It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system. Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy–makers. • Recognizing the Roles of State and Local Areas/Regions in the Plan The Southern Alleghenies Workforce Development Board recognizes and applauds the Governor's goals for the citizens, residents and employers of our great state. It is the intent of our board and workforce partners to do all we can to bring these to fruition. In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the State Board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget) and analyzing local conditions so that they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the state by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. Local Elected Officials (Jeffrey Thomas, Chair) of Southern Alleghenies Workforce Development Board offered multiple comments to include: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system encompasses much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, and also the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area's federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response dollars in support of retraining and each year a portion of these funds go unspent. Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront and face of and for delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Furthermore, considerable portions of our region are not serviced by high speed internet. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink(R) centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks

to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Robin Youger of Southwestern PA Area Agency on Aging offered multiple comments to include: • The planned actions to coordinate activities of SCSEP grantees with the WIA title I programs (p. 205) are sound. We maintain an effective partnership with all four CareerLink offices in our service area, and the One–Stop delivery system presents opportunities for both job–seekers and potential employers. Our seasoned Job Developer works diligently to ensure the development and execution of mutually–beneficial initiatives for consumers, partnering agencies, and communities in our service area through the CareerLink centers. Response: We appreciate the comment in support of our planned actions. • The planned actions to coordinate SCSEP with Older Americans Act activities (p. 206) are very effective when combined with complementary resources such as those available through the PA Link to Aging and Disability Resources. Participants, particularly those with disabilities, benefit most from this collaborative network and frequently discover types of assistance they would never have located without the SCSEP program, including supportive services (p. 217) that may help them find or retain unsubsidized employment when they reach their duration limits with the SCSEP program. Response: We appreciate the comment in support of our planned actions. • We were honored to be used as an example of exemplary networking and job development in rural locations (p. 207). Our three counties are primarily rural and listed as such by the Center for Rural PA. This reinforces our belief that none of our counties should be designated as “urban” under Equitable Distribution criteria. Response: We appreciate the comment as your agency was very deserving of recognition. The designation of "rural" means an area not designated as a metropolitan statistical area by the Census Bureau and is largely determined by zip code through the Rural Urban Commuting Area (RUCA) system • The long–term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants into unsubsidized employment (p. 207) works well in high–growth industries. However, this should be periodically reexamined as markets and needs change. Response: We appreciate the comment and note that local markets and needs change. SCSEP subgrantees are provided with updated workforce development data on a regular basis to reflect such changes. • Our SCSEP program has been successful in serving minority older individuals (p. 207) using the strategies discussed, including conducting extensive outreach through community groups and media, social and cultural group settings, chambers of commerce, and other outlets. Response: We appreciate the comment in support of our planned actions. • We agree with and support the decision to allow the identification of the types of community services needed, as well as the location of these needed services (p. 208; p. 215), to be done at the local level. Types and location of community services needed vary within our three–county service area, and we appreciate the ability to independently make these assessments and determinations on a local level. Response: We appreciate the comment in support of our planned actions. • We agree that ongoing local trainings (p. 212) and trainings conducted by the Department of Aging do contribute to the continuous improvement in the level of performance for SCSEP participants’ entry into unsubsidized employment (p. 208) because these provide SCSEP and agency staff with current examples of best–practices as well as provide valuable networking opportunities. Response: We appreciate the comment in support of our planned actions. • We agree that the subgrantee recruitment methods outlined (p. 213–214) are very effective in helping achieve the Most in Need performance goal. Response: We appreciate the comment in support of our planned actions. • On duration limits (p. 215), we would encourage a reexamination of reinstituting duration limits waiver factors, as well as the adoption of a plan to extend the durational limits for our most in–need demographics, including those age 80 and older, pre–911 veterans, and those with mental or physical disabilities. These participants greatly benefit from the SCSEP program. Unfortunately, more time is often needed to allow them to become job–ready. We feel reinstating discretionary use of duration limits waivers will better prepare these participants for more successful outcomes. Response: The PA Dept. of Aging (PDA) understands the comment as it originally did allow for a waiver of the 48–month durational limit policy if a participant had at least one of seven waiver factors. PDA subsequently changed its policy to no

waivers because of input from 85% of its SCSEP providers in 2011 to change the policy to no waivers. • Finally, we appreciate the recognition given to our agency for the implementation of the computer training developed by one of our host agencies (p. 216–217). This training will continue and has been cited by several SCSEP participants as greatly improving their job performance. Response: We appreciate the comment in support of the policy. Community Legal Services and the Community Justice Project submitted comments on behalf of Success Against All Odds and Just Harvest as follows: • Community Legal Services (CLS) and the Community Justice Project (CJP) submit these comments on behalf of Success Against All Odds, Just Harvest, and the thousands of clients CLS and CJP represent every year who seek to better their lives through better jobs in strong support of the Wolf Administration's proposed Workforce Innovation and Opportunity Act (WIOA) state plan, which was published for public comment on December 28, 2015. Our comments focus on: (i) priority of service for recipients of public assistance; (ii) Career Pathways; and (iii) Transitional Jobs (subsidized employment). Response: We appreciate the comments provided. • Priority of Service: As advocates for low–income families we had a strong interest in assessing whether the proposed WIOA state plan ensures access to job training opportunities for parents whose families receive public assistance. We see this as critically important in order for these parents to acquire the skills and credentials needed to qualify for jobs that are in–demand, pay a family sustaining wage, and will allow them to be self–supporting. Our Position: We think the plan, as proposed, does a good job of addressing the training needs of low–income parents through strong and mandatory provisions implementing WIOA's priority of service provisions for recipients of public assistance and other low–income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10–12, ¶¶ 2.1 and 2.11) The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what "priority of service" means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67–70) Among other benefits, access to training services for recipients of public assistance would enable low–income parents to qualify for WIOA Title I funds to pay for short–term 12 month or less community college job skills training programs. This type of training can lead to in–demand jobs that pay very good wages. Currently, parents whose families receive public assistance are unable to participate in such programs because short–term training programs do not qualify for financial aid and these parents cannot afford the tuition. Access to Individual Training Accounts (ITAs) funds through LWDBs and CareerLinks to pay tuition for short–term training would provide an important avenue to self–sufficiency for parents currently forced to rely on public assistance to support their families. The Department of Human Services (DHS) runs a program, called KEYS, that has proven very successful in assisting parents receiving Temporary Assistance for Needy Families (TANF) in enrolling in and completing community college Associate Degree programs. Many of these parents are either better suited for or would prefer to participate in the short–term 12 month or less job skills programs offered by community colleges, but cannot do so because they cannot get financial aid for these programs and cannot afford the tuition. Access to ITAs would solve that problem for these parents. Response: We appreciate the comments in support of the plan. We echo the commenter's suggestion that KEYS has proven successful in assisting parents receiving TANF enroll in and complete community college degree programs and note that we discuss utilization of KEYS in the plan as a means to increase access to postsecondary education. • Career Pathways: We were also very interested in whether the proposed WIOA state plan provides for Career Pathways training programs. Career Pathways programs provide adult education (literacy/English–as–a Second Language/GED), career counseling, and transition to postsecondary education and job skills training; these have proven highly successful. States are strongly encouraged by WIOA to develop and operate such programs. To give a sense of what a difference access to Career Pathways programs could make for families on public assistance, consider that over forty percent of adults receiving Temporary Assistance to Needy Families (TANF) lack a high school degree or GED. Less than three percent of these parents are participating in GED

programs. The DHS does not operate Career Pathways or any other adult education programs for parents on TANF. Providing access to Career Pathways programs to parents on public assistance through LWDBs and CareerLinks would provide a pathway from public assistance to employment at family sustaining wages – a benefit not only to these families, but to the state as well. We were very pleased with the provisions in the proposed WIOA state plan regarding Career Pathways (See, Proposed WIOA State Plan, pp. 8–10) Our Position: The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions. Response: We appreciate the comments in support of the plans requirement that career pathways include entry points at the literacy, ESL and GED levels. • Transitional Jobs: WIOA allows states to spend up to 10% of Title I funds on transitional jobs, i.e., subsidized employment, opportunities for participants. Access to transitional employment slots for low–income persons can provide valuable work experience that can lead to permanent employment. This is particularly important for recipients of public assistance, many of whom want to work but lack work experience. Our Position: The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this. Response: We appreciate the comment in support of the plan's requirement that 5 to 10 percent of local board funds be used to provide transitional jobs. • Legal Basis and Need for Strong Priority of Service Provisions: WIOA, like its antecedents — the Workforce Investment Act and the Job Training Partnership Act — , places special importance on serving high needs groups. According to WIOA: Priority for individualized career services and training services must be given to: (i) recipients of public assistance; (ii) other low–income individuals ;and (iii) individuals who are basic skills deficient WIOA strengthens the priority of service requirement by, for example, eliminating the provision under the Workforce Investment Act that priority of services only applies when funds are limited. Under WIOA priority of service must be provided, regardless of funding. Strengthening the priority of service requirement was clearly needed, as a declining number of persons with barriers to employment were served under WIA, despite its priority of service requirement. National data show that only 48.7 percent of adult "exiters" who received training and/or intensive services through the WIA Adult funding stream were "low–income individuals" in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients.1 Over the past decade and a half, WIA delivered training services to a declining share of low–income individuals, and WIA served a far lower percentage of low–income adults than the predecessor federal law in place before 1998, the Job Training Partnership Act, which required that 90 percent of the funds for adults were targeted for those who were low–income. The underlying intent of WIOA, WIA, and the JTPA, and past failure by states to realize the goal of priority of service, provide strong reasons to support the Wolf administration's approach to this critical element of WIOA its proposed state plan. Response: We appreciate the comments in support of the administration's approach to implementing priority of service provisions. • Recommended Clarifying Edits to the Proposed Plan: Priority of Service Benchmarks: The Proposed WIOA State Plan takes an important step by including at ¶ 2.1 on pages 10–11 a requirement that local agencies meet certain phased in benchmarks for the percentage of Title I funds to be spent on training and the percentage of those funds that must be spent on "low–income individuals and individuals with other barriers to employment." 2.1 The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set–aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding

must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. The commonwealth will establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. The benefit of such a benchmark is that it could potentially ensure that local agencies are giving priority for Title I training services to the high needs groups that Congress prioritized, namely, recipients of public assistance, other low–income individuals, and basic skills deficient individuals. We stand fully behind the intent of this provision, but feel it is not tied tightly enough to its objective. The benchmarks for percentage of those provided training services should be linked directly and solely to those groups entitled to priority of services under WIOA. This would best be done by adding a definition of "low–income individuals," tying it more precisely to the federal WIOA Priority of Service groups, and by deleting the "individuals with other barriers to employment" language. These two changes would align the benchmark with the priority groups established in WIOA and the measurements used by the federal Department of Labor to track whether state are meeting priority of service goals. According to the Center on Law and Social Policy, the summary administrative data collected by U.S. Department of Labor (DoL) (in the "WIASRD Data Book"), from which state performance with regard to the Title I Priority of Service requirement can be publicly monitored, uses "low–income individuals" as its key data field. DoL collects data from each state regarding the characteristics of all participants served in the Title I program, including specific data on "exiters" who received training services funded by Title I–Adult dollars. These data also show the percent of such exiters who are "low income" as well as the subset of those low–income individuals who are public assistance recipients. The larger group of low income individuals is an excellent proxy for the three types of individuals that are required to be given priority of service for Title I–Adult funding (low income, public assistance recipients, and basic skills deficient).3 Tying the proposed state benchmarks strictly to "low–income individuals" would allow an "apples to apples" comparison with the federal data related to priority of service. Including "individuals with other barriers to employment" does not allow an "apples to apples" comparison with the federal data and, therefore, would make it more difficult to determine whether local agencies and the state are meeting priority of service goals. Here is how we think the provision should read: The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set–aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. The commonwealth will establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. For purposes of these benchmarks, "low–income" means recipients of public assistance, other low–income individuals, and individuals who are basic skills deficient — all of whom are entitled to priority of service under WIOA Section 134(c)(3)(E). Lastly, we note that the Section with detailed Priority of Service guidance also includes a benchmark provision for training services to groups entitled to priority of service (see, page 68). This provision differs slightly from the one, above, at Section 2.1 on pages 10–11 in that it would require that LWDBs and CareerLinks meet a seventy percent requirement right away without a phase–in period. We are comfortable with either approach. Response: We appreciate the comment and will take it under advisement as future policies are developed and benchmarks are revisited. We note that the final plan includes a statement that the state will revisit training benchmarks annually, which will also include review of the percentage of training funds for populations with barriers. We also note the commenter's view that there is inconsistency between the training benchmarks in Goal 2.1 and the priority of service language on page 68. In response, we would like to clarify that the target population under the training targets in

Goal 2.1 is slightly broader than the strict priority of service populations defined on page 68. While those with barriers likely also meet priority of service definitions, it is possible that some may not. This gives local areas a bit more flexibility in meeting the training targets set in Goal 2.1. Leslie LaBarte of Sugar Grove Free Library offered multiple comments to include: • After looking over the draft plan, I feel that out in Sugar Grove, we already do a lot of those tasks. I am frequently encountering patrons that have zero tech skills and have been let go because o their jobs became to technical and they were never given the extensive repetitive training that I'm finding some older adults require o their businesses have closed and this was the only job they had ever known o they have been laid off and are being required to search for other employment Many come here after having a terrible experience at the local CareerLink. So I would like to see added additional training for CareerLink staff in dealing with people with zero tech skills. I know it couldn't be added to the Youth section, however, I think older adults are in just as much need as the youth. Plus, this could be something they are already trained on, but I am just going by the frustrated and often tearful patrons that come here after being sat at a computer at CareerLink and being expected to know how to open a word document, let alone create a resume. Frankly, I feel since libraries are doing some of these jobs and our funding is usually on the chopping block, that we should also be receiving funds for these projects. I have spent many days teaching basic computer skills, internet skills, (which includes the fear of entering personal info online) and then job skills to help just 1 person find a job, even down to helping them know how to dress and what kinds of questions they might be asked on an interview. Then it is usually within the next week or 2 that I am doing it again for someone else, while my assistant and I are constantly networking the job market in our area, keeping our ears open to who might be hiring or engaging business owners to see if they know of anything. Response: We appreciate your comments about services to jobseekers provided by your library and the expanded role that could be played. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan. • This would all be perfectly fine if I had a staff, but currently there is myself and a part–time assistant because we don't have funding for a 3rd person. We are trying to serve our end of Warren County and our community the best we can, but since we are already doing the trainings, outreach, and offering internet services for many hours during the day. I actually just had a lady walk in saying the CareerLink is closed from 12–1 and that is inconvenient because she has to wait for someone to come watch her mother before she can then drive 20 min to Warren. She has 2 masters degrees and a license and can't afford internet at her home and as of today has no income coming in after the non–profit she was working at lost funding and couldn't afford to keep her. These are the issues facing my community and what we are already doing to help our community. We are not always great at tooting our own horns, but we are important to our communities. Please consider adding libraries to the draft plan. Response: We appreciate the further comments about services provided by the library to jobseekers and the additional challenges that exist in rural communities. William Coiley of Suncom Industries, Inc. commented: My name is William Coiley and I am the Procurement Manager for Suncom Industries,Inc., Northumberland ,PA. I have spoken to several of our business customers and they have asked me to formulate a letter to the Commonwealth in support of "Choice", as an important right of all Pennsylvanians with disabilities when it comes to seeking and identifying employment opportunities. Many of our customers have toured Suncom Industries and have been introduced to a wide group of Individuals that work on their respective projects/jobs…and many have returned for repeat visits to offer praise and congratulations on the success of their completed work. The following is a list of customers with their identifying names that wish to offer support for the Individuals "Choice" while at the same time, respecting the Federal Government 14(c) program. Buzzy, Inc……Diane Oxenrider Escopac…….Brian Kingston First Quality Products…….Ryan Crawford USP Lewisburg……..Patrick Ramirez Vargo Outdoors……Brian Vargo Passage Foods……Camden Buscko Response: We appreciate the comment and await the release of final regulations, guidance, and technical assistance on Section 511 Limitations

on Use of Subminimum Wage. The WIOA state plan does not include any provision to "eliminate" the FLSA 14c certificate program. Rather, new requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate. Maureen Cronin of The Arc of Pennsylvania offered multiple comments to include: • The Arc of Pennsylvania is a statewide nonprofit organization that provides advocacy and resources for citizens with intellectual and developmental disabilities and their families. It was established in 1949 and currently includes 34 chapters in 57 counties and over 8,000 members across Pennsylvania. The Arc is a grassroots, member–driven organization led by people with disabilities and their families. Local chapters provide services and advocacy for individuals with intellectual and developmental disabilities and their families, and most of our chapters provide services as well. Thank you for this opportunity to comment on the WIOA Combined State Plan. We approach the issue of employment for people with disabilities uniquely, as we are foremost advocates and also providers of supported and sheltered employment. Our chapters and members across the state are personally and professionally impacted by the changes and improvements proposed in the combined state plan. The Arc of Pennsylvania is proud of the work our chapters have done to support employment outcome for people with disabilities. Notably, ACHIEVA (which oversees The Arc of Greater Pittsburgh, The Arc of Beaver, and The Arc of Westmoreland) has made the commitment to transition away from sheltered workshops settings and develop community opportunities for those they support. The Arc of Washington County has successfully transitioned individuals from sheltered settings to community–based employment using the Discovery model; additionally, many of our chapters have staff certified to provide Discovery and Customized Employment services for people with the significant disabilities. Our comments are informed by this perspective of prioritizing issues that most impact people with disabilities and their family members; please note that our comments focus mainly on the Office of Vocational Rehabilitation's portion of the plan. Response: We appreciate the comments. • The Arc of Pennsylvania strongly supports the Commonwealth becoming an "Employment First" state (pg 12). The state needs an Executive Order that delineates the responsibilities of the Department of Human Services, Pennsylvania Department of Education, and Department of Labor and Industry in carrying out an Employment First policy. Without an Executive Order in place, an Employment First policy will not have consequence or impact in Pennsylvania. Response: We appreciate the comment in support of an Employment First policy and note that the plan states that "Employment First" will be the policy of all executive branch agencies under the jurisdiction of the Governor in serving persons with disabilities. An Executive Order was issued by the Governor on March 10, 2016.

• We recognize that WIOA puts significantly more responsibilities on the Office of Vocational Rehabilitation (OVR). The Arc of Pennsylvania is pleased that OVR is focusing such efforts on youth with disabilities age 14–21, as evident in the draft plan. We urge OVR to consider that plans to provide pre–employment transition services (including internships and community based work experiences) to students with complex needs must be individualized, based on interest, and must consider identifying the conditions necessary for the student to be successful in employment. We urge OVR to include travel training in the expanded services for transition age youth (pg 146), as transportation is critical to community employment for people with disabilities. Response: We appreciate the comment in support of the plan and OVR's efforts in providing pre–employment transition services to students with disabilities. OVR's long term goal is to have every student with a disability having a least one paid work experience prior to graduation. Travel training will be made available to OVR customers as outlined on their IPE. • We commend OVR for their work to prepare for these changes, particularly preparing for new pre–employment transition responsibilities by planning for a point of contact for Local Education Agencies (LEA) in each OVR district office (pg

117) and initiating a Discovery & Customized Employment pilot (pg 146). The Arc of Pennsylvania looks forward to the outcomes of the Discovery pilot currently under operation in the Harrisburg, Washington, and Philadelphia areas. Response: We appreciate the comment in support of replication of the Discovery & Customized pilot. • Additionally, we applaud OVR for its shift towards blending customized employment and supported employment services – helping providers become certified to provide customized employment services is key to ensuring the quality of customized employment services for people with the most significant disabilities (pg 144). We remain concerned that despite efforts to anticipate staffing needs of OVR in the coming years (pg 123), overall the agency needs a greater staff contingency to take on the increased responsibilities under WIOA. Response: We appreciate the comment in support of the plan. OVR has designated a Rehabilitation Specialist position implementing a proactive OVR Recruitment Plan for the purpose of actively recruiting qualified Vocational Rehabilitation Counselors, Vocational Rehabilitation Counselors for Deaf and Hard of Hearing, Orientation & Mobility Specialists and Vision Rehabilitation Therapists within Pennsylvania and nationwide to fill current and future anticipated vacancies. OVR acknowledges a need for greater staff contingency to take on the increased responsibilities under WIOA and the recently approved OVR–ODP MOU Interagency Funding Agreement will provide necessary resources to enable the agency to move forward with hiring dedicated VRCs to serve students/individuals with ID and Autism. • The Arc of Pennsylvania strongly supports the excellent efforts OVR outlines in this plan to work in and with LEAs, in order to strengthen the transition process and employment outcomes for students with significant disabilities. Particularly, we highly support OVR's plan to crosstrain OVR staff and LEA staff (pg 117); this is critical to improving the transition process for students with disabilities and ensuring that families know their options and rights related to employment services. Our primary concern in this time of transition is that the changes and improvements to services do not inadvertently hurt youth with disabilities. As young adults with disabilities graduate high school and sub–minimum wage settings are no longer considered as employment transition options, families are losing a model that guaranteed their child with a disability would have transportation and activity during the standard work day. The Arc of Pennsylvania unequivocally supports living–wage, community–based employment for people with disabilities; we also recognize that jobs in the community come with different obstacles to success, including different schedules and transportation considerations. The Arc of Pennsylvania is concerned that, due to the more irregular nature of employment in the community, young adults with disabilities could inadvertently be forced into non–paying volunteer positions or day programs simply because these options offer a steady schedule and regular transportation. While sheltered workshops are not the consummate model for employment of people with disabilities, we know that individuals with disabilities have a sense of accomplishment from going to work and earning some money. It is essential that the opportunity to have a paying job is preserved for youth with disabilities as they transition from high school. Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities such as expansion of Customized Employment and Discovery pilots while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. • Traditional vocational assessments and supported employment practices have not resulted in community jobs for people with the most significant disabilities. While cognizant that OVR is waiting for regulatory guidance from the Rehabilitation Services Administration, OVR must delineate a clear plan for how students newly eligible for pre–employment transition services will be designated for OVR supported employment services and addressed in Order of Selection Criteria (pg 135–136). These individuals have already been denied as non–employable, or would be rejected as non–employable, under existing criteria. Specifically, we request clarification on: o What is the specific plan to address meeting this requirement and ensuring that individuals with the most significant impact of disability have access to expanded apprenticeships, internships, and on the job training? o What is the in–service/training plan for OVR Counselors making these determinations to ensure that individuals now eligible for services under WIOA requirements will be selected for

supported employment services by OVR? o When working with individuals with more significant impact of disability, the complexity of needs require a different view and approach that is provided in ‘typical’ supported employment services; what is OVR’s plan to ensure that effective services are provided from the perspective of supporting individuals with complex needs? o How will the criteria for eligibility for extended services be determined? While some information is given as to the process for extended services (pg 160), OVR must ensure that individuals with complex support needs are not excluded from eligibility for supported employment services because they may require extended support services. Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. • As a leader in this transition, we encourage OVR to serve as a strong resource to families by providing family training on employment options following high school, including alternatives to sheltered workshops. Developing a training plan for families would be further strengthened by partnership and commitment between the Department of Labor and Industry, Department of Human Services, and Pennsylvania Department of Education. The expectation that youth with significant disabilities can have an integrated, living–wage job in the community will be a challenge to culture and perception in some families, school districts, and communities. OVR and its partners will play a critical role in shifting employment of youth with the most significant disabilities from sheltered settings to community–based settings, as well as assuaging the concerns of families and providers throughout this transition. We encourage OVR to train Early Reach Coordinators and LEA points of contact in each office, and share widely with LEAS, the option for Discovery and Customized Employment for youth with the most significant impact of disability. Young adults with disabilities and their families are not familiar with this service as an option; sharing the model and successes of Discovery will increase awareness of the positive community employment opportunities for youth with significant disabilities. Additionally, PA CareerLink must shift to support the diversity of Pennsylvanians seeking work including individuals with significant disabilities; this includes providing accessible, relevant communications to job seekers. Providers of sheltered employment are partners in the effort to increase community–based employment for young adults with disabilities. These providers need support and funding to transition services away from segregated settings. We applaud OVR for their plans to use Innovation and Expansion projects to improve employment outcomes for people with the most significant disabilities; this will provide further opportunities for providers to be a positive force of change towards increased community employment (pg 156). We urge OVR to communicate widely with providers about the opportunities for these projects. In order for the proposed pre–employment transition services to be effective, service models must address the individual conditions for success of each student. Internships, work–based learning experiences and other work related opportunities must be designed to identify the specific skills (potential job tasks) a student can perform, strategies for teaching new skills, and conditions to be successful in the workplace. Traditional work–based learning experiences, based on acquiring a ‘set’ of ‘job slots’ to practice skills, has proven ineffective for individuals with significant impact of disability. OVR must address a plan with service providers to develop effective practice in implementing these support services for students with significant impact of disability now eligible for services via the WIOA regulations. Response: We appreciate the comment that a policy in favor of integrated employment for youth with significant disabilities may be a challenge to culture and perception of some school districts, communities and families. PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities. • The Arc of Pennsylvania supports and encourages OVR’s endeavors to increase communication towards current and potential customers of OVR services (pg 111); we anticipate that all communication will be accessible to people with disabilities. We urge OVR to increase outreach efforts to the business community. Business and industry leaders must be informed about the workplace contributions which hiring individuals with significant disabilities can provide. Particularly with the changes in services due to

WIOA, OVR's efforts to communicate with families, school districts, businesses, and providers is critical to achieving positive employment outcomes for youth with significant disabilities. The employment of individuals with significant impact of disability must also be a specific focus in community education and outreach efforts. This population has not traditionally been eligible for OVR's employment support services and perceptions about the employability of individuals with significant impact of disability can be a barrier to successful implementation of the requirements of WIOA. As part of its efforts to improve communications with customers, The Arc of Pennsylvania also urges OVR to limit the wait time of people referred to supported employment services (pg 119–120) to no more than 30 days. This will standardize and ideally minimize the time that customers are waiting for OVR eligibility determination. Additionally, each OVR customer should know their option to request a change of counselor. Response: We appreciate the comment in support of the plan. OVR's Business Services and Outreach Division (BSOD) increases outreach efforts to the business community and provides singularity of focus and resources to better understand and respond to business needs in a dual customer service model (talent supply and demand sides). OVR is considered the lead state agency and preferred resource for businesses or organizations to recruit and on–board individual with disabilities (IWD) through a single point of contact (SPOC) model. OVR will increase alignment with Council of State Administrators of Vocational Rehabilitation (CSAVR) VR–National Employment Team (VR–NET) through Business Services Division agency– wide consistency in delivery of high quality business services utilizing emerging practices in an evolving, national VR community of practice. OVR's BSOD team is very active and engaged with the business community across the state. All District Offices have hired Business Service Representatives and they are active in community outreach and employer engagement through activities in local Society for Human Resource Managers chapters (SHRM) as well as Regional Chamber of Commerce meetings and events. We also continue to utilize the CSAVR National Outreach Contacts with employers and to encourage combined Bureau VRC's to register their consumer customers in the Talent Acquisition Portal (TAP) resume bank. • We note that the state draft plan relies heavily on MOUs and interagency coordination between the Department of Labor and Industry, the Pennsylvania Department of Education, and the Department of Human Services. We applaud the measures being taken to create and update connections and coordination between the departments. The Arc of Pennsylvania anticipates that all agreements and MOUs between the departments will be substantial, functionally implemented, and will carry consequences for non–compliance. Response: The commonwealth appreciates the comment and recognizes the importance of meaningful accountability provisions in interagency MOUs. Stefani Pashman and Mark Latterner of the Three Rivers Workforce Investment Board offered multiple comments to include: • The Three Rivers Workforce Investment Board (3RWIB) strongly supports the Governor's vision and goals outlined in the Pennsylvania WIOA Combined State Plan, including developing viable career pathways, expanding training opportunities, improving data sharing and integration, strengthening collaboration across agencies and sectors, and building a stronger workforce development system that works for both job seekers and employers. 3RWIB will work together with our local and regional partners to achieve the Governor's objectives and offers suggestions below to strengthen the system's ability to respond to the needs of businesses and job seekers 3RWIB appreciates the opportunity to review and provide input on the combined state plan. In support of this process, we also offer to provide a local perspective on program implementation, participate in focus groups, or actively pilot and evaluate new initiatives proposed by the Governor to help create evidence that practices work. With respect, 3RWIB submits the following comments and recommendations: Response: We appreciate the comment in support of the Governor's vision and goals. • Data Integration and Accessibility: 3RWIB is encouraged by efforts discussed in the state plan to build a greater level of integration between the Commonwealth Workforce Development System (CWDS) and other case management and data collection systems across programs. This integration is necessary to improve the coordination of services for individuals throughout programs and understand the effectiveness of multiple interventions. Opportunities remain to strengthen the Commonwealth's plan for improving

the coordination and use of data across systems: 1. Local Data Access: In a system driven on accountability, local areas need real time data to ensure that programs are being run effectively, services are not duplicated across programs, and that public funds are being spent with an eye toward the return on investment. 3RWIB is encouraged to see the Departments linking data to ensure validity. There are additional opportunities in which the Commonwealth could support local areas in achieving goals by enabling local areas to access (when possible) data from specific state systems. 3RWIB recommends the following: a. To support local areas in their effort to serve individuals with the greatest barriers to employment, the Commonwealth should allow local areas access to data from the state's COMPASS system. This access would enable PA CareerLink® staff to streamline the process for determining WIOA eligibility by reducing paperwork requirements and allowing for verification of eligibility on–site. For example, youth program staff currently estimate up to 25 percent of staff time is spent determining eligibility when processing youth applications. Access to COMPASS data would also enable more targeted outreach to populations with barriers to employment. Furthermore, COMPASS data would provide staff with a better understanding of the services currently being accessed by participants, enabling staff to more effectively provide referrals. By enabling staff to assess the variety of services being accessed by individuals, these data would also increase understanding of the combinations of human and workforce development services that work best when serving clients. Response: DHS is exploring the possibility of sharing information between COMPASS and the PA CareerLink® system. This is a part of a multi–faceted project we are working on within DHS. Our goal is increase data sharing so recipients can access more services in an efficient manner. • The combined plan discusses that Unemployment Insurance Wage Records will be merged with participant data from all core partners and access to the quarterly UI wage records will be granted within the constraints of PA regulations for program evaluation purposes (page 66). Where possible under PA regulations, disaggregated data from these records should also be shared with local areas. Local access to these data, which provides a more real–time assessment of program outcomes, is needed to fully understand the impact of systemic efforts across programs, improving accountability of all programs in meeting the Governor's goals. Access to these data would also be particularly beneficial for youth programming, as youth clients tend to be more ephemerally tied to the system and the additional burden of retention measures will be an administrative challenge for youth programs. Response: Access to quarterly UI wage records for the purposes of program evaluation will be granted within the constraints governing confidentiality of claimant unemployment insurance and personally identifiable information. • Workforce Development Quality Initiative (WDQI): The combined state plan discusses the PAWDQI, an initiative to link data from the workforce development and education programs in Pennsylvania that use different systems of record (page 55). To build upon the commitment of the Commonwealth to implement the PA–WDQI and increase data–driven decision making at the local level, the following steps are recommended: o Where possible, use of wage record data should be implemented to understand outcomes of all programs included in the combined state plan. As mentioned, this data would strengthen understanding of the effectiveness of shared efforts across programs in serving individuals with barriers to employment by allowing more real–time analysis of program impact. o The Commonwealth should establish a clear timeline within the state plan for implementation of the PA–WDQI, including setting firm targets and goals for the initiative. It is not clear within the current plan when LWDBs should expect the PA–WDQI to be implemented or how LWDBS can contribute to or benefit from the system. Response: Wage record data will be used to produce program outcomes where applicable and practical. A clearer timeline for WDQI will be established once commitments from additional partners are received. • Balancing the Needs of both Job Seekers and Employers: 3RWIB commends the Governor for the vision of serving populations most in need of workforce development services through the public system. 3RWIB also recognizes the significant value of training to help job seekers gain the skills and credentials in demand by employers, enabling them to enter employment opportunities along viable career pathways. However, some strategies and requirements within the state plan may create challenges in effectively meeting the needs of both job

seekers and employers: Response: We appreciate the comment. • Training Benchmarks: The combined state plan includes benchmarks set by the Commonwealth for how much WIOA Title I funding must be used for training, as well as the percentage of these training funds that must be spent on individuals with barriers to employment (page 10). 3RWIB will strive to meet these targets. In setting training benchmarks, however, it is recommended that the following be considered: o Training benchmarks should not apply to WIOA Youth programs. WIOA youth participants have significantly different needs than adult and dislocated workers, not all of which can be served through training. Prescriptive thresholds for funding allocation would be particularly detrimental for youth programs, where elements like adult mentoring and training and follow up are both time and cost intensive and vital to the success of youth participants. o Training benchmarks should not apply to Dislocated Worker programs. Dislocated Workers commonly already possess in–demand skills and benefit from employment and job placement services that allow them to reenter the workforce quickly rather than devoting longer periods of time to training. In Pittsburgh and Allegheny County, Dislocated Workers that did not participate in training had a job placement rate of 91% and average wages of $17.21, just under the 92% rate and $17.81 average wages for Dislocated Workers that participated in training. o The Commonwealth's definition of training expenses should be broad and include all staff expenses directly related to providing training services as defined in Section 134(c)(3) of WIOA. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service: The combined state plan sets a target for 70 percent of job seekers served through local PA CareerLink centers to be individuals with priority of service (page 68). 3RWIB applauds the Governor for his emphasis on serving individuals with barriers to employment. To support LWDBs in meeting this goal and to prevent any unintended consequences, such as a slower response to employer needs, it is recommended that the following be considered: o The Commonwealth should support LWDBs in meeting this priority of service target by providing local areas with access to additional state data systems, including COMPASS data. These data would streamline the process for determining eligibility for priority of service by reducing paperwork and enabling onsite verification. These data would also support local outreach efforts to individuals with priority of service. o WIOA does not require priority of service for dislocated worker populations. In order to best serve local businesses, the Commonwealth should exclude dislocated workers from priority of service calculations. o The Commonwealth should take this priority of service target into account when setting performance levels, including for the measure "Effectiveness in Serving Employers." Setting a high benchmark for serving priority of service individuals presents a challenge when also meeting the needs of employers. Populations with priority of service often require supportive and more intensive services, extending the length of their program participation. This in turn lengthens the time required to serve employers. Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also take into consideration the additional recommendations. • Additional Burden upon Employers: 3RWIB supports the Governor's goal to expand training opportunities, including work–based training, to better serve job seekers. 3RWIB also supports the Governor's goal of strengthening efforts to engage employers with the public workforce development system. However, requirements within the combined state plan may increase the burden and challenge the participation of employers. The following is a key example that should be considered: o Workforce System Policy No. 04–2015, referenced in the combined state plan (page 82) creates a new requirement for work–based training providers to be placed on a Local Training Provider List (LPTL) to provide training services. Employers must provide a variety of program information, including program performance, to be considered for the LTPL. WIOA did not include this requirement and the State plan should remain consistent with WIOA to maximize opportunities for employer engagement. Additional administrative burdens will increase the time and effort required by employers to complete a training contract, creating an additional obstacle to employer engagement. Response: Although WIOA does not require the collection of performance

information from training providers (regarding their associated programs) exempted from the statewide ETPL (i.e., work–based training programs), the Governor has determined such a list be developed, maintained and disseminated. This enhancement will ensure accountability of training providers at the local level; the quality in the training programs offered throughout Pennsylvania; assessment of the return on investment of WIOA title I–B training funds; and the facilitation of customer choice. Additionally, the commonwealth does not intend, nor does it anticipate, any additional burden on the employer beyond what is federally mandated for reporting. • Focusing on "High Quality Jobs": In the combined state plan, the Commonwealth "will require LWDBs to prioritize funds to be used for business services activities, on–the–job training and incumbent worker training to those employers offering high quality jobs" (page 16). To support the Governor's goal of developing viable career pathways, it is also important to consider the value of positions offering an entrance to career pathways leading to higher quality jobs. 3RWIB recommends that "high quality jobs" continues to allow for engagement with employers offering entry–level positions along career pathways, consistent with WIOA. These positions are crucial to providing WIOA participants, particularly individuals with priority of service, with an opportunity to initially enter a career pathway that offers opportunities for advancement into "high quality jobs". Response: We appreciate the comment and note that we include language, for example, in Goal 4.1 allowing for jobs that are likely to lead to high–quality jobs. • Coordination across Partners and Programs: 3RWIB supports the purpose of a combined state plan that outlines the strategy, vision, and goals for workforce development across all core and partner programs. The Commonwealth's combined plan could be strengthened by providing greater discussion on how programs and partners will truly work together to achieve the Governor's goals. It is recommended that the combined state plan include more specific language and detail that ensure all partners and programs work together and are accountable for meeting the Governor's goals. The following are examples: o WIOA emphasizes equal accountability across all core programs. Performance in WIOA will be measured on both a program–specific (through a set of common measures for all programs) and system–wide basis (how well programs achieve collective outcomes). A systemic performance measure should be set in the combined state plan to ensure all programs are held accountable together in meeting performance goals. o The combined plan should include specific language and mutual requirements for how programs will coordinate to ensure appropriate referrals between WIOA Titles to reduce duplication of services and meet the variety of participant needs. o 3RWIB recognizes the value of co–enrollment to more effectively meet the multiple service needs of individuals. The combined state plan should set clear expectations and mutual requirements for how programs will work together to identify ideal candidates for co–enrollment. o 3RWIB is encouraged by the Commonwealth's plan to enhance agency coordination in providing business services (page 16). However, the combined plan would benefit from greater detail on how this enhanced coordination would work. More importantly, having a clear set of expectations and mutual requirements for each partner and program would facilitate collaboration among partners. This coordination is necessary to improve efficiency and reduce the duplication of work in employer engagement. Response: We appreciate the recommendations and will discuss them with the interagency team referenced in the State Plan. We also note that we will consider plan modifications as additional policies and procedures are developed around program coordination. Chris Snyder of the UFCW Local 1776 Northeast & Central Divisions offered multiple comments to include: • Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry–recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce

area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self–service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face–to–face career coaching and mentoring as well as the many other hands–on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities. Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Congressman Glenn 'GT' Thompson of the US House of Representatives offered multiple comments to include: • I write to provide input on the Pennsylvania's Workforce Investment and Opportunity Act Combined State Plan draft that was released to the public for review and comment. As a member of the House Education and Workforce Committee, I was honored to play a part in moving WIOA through the legislatiove process and to the President's desk, where it was signed into law on July 22, 2014. This long overdue bipartisan reauthorization of the Workforce Investment Act (WIA) aims to reshape the nation's approach to job training, and bring the law into alignment with the needs of our advancing economy. The intent of this legislation is to deliver more comprehensive services to workers, job seekers, and employers. Additionally, WIOA takes steps to improve performance accountability and transparency, with the hope of growing consumer confidence in training services. Since first being elected to Congress in 2008, I have represented Pennsylvania's largest congressional district which includes approximately 24 percent of the commonwealth. My district, and Pennsylvania as a whole, consists of diverse regions that come with unique sets of needs. Therefore, as you move forward with the process of issuing state–specific guidance on the provisions of WIOA, I ask that you focus on encouraging local flexibility based on local needs as Congress intended. Following the release of the combined state plan draft, I received feedback from stakeholders in my district who will be on the front lines of supporting the Governor's proposed goals and objectives, including members of local workforce development boards, the PA Workforce Development Association (PWDA), and the County Commissioners Association of PA. While leaders within these organizations are eager to play a key role in improving the quality and structure of Pennsylvania's approach to job training, they have outlined some areas of concern within the state draft plan. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. • One of the most significant concerns shared by the aforementioned stakeholders are the WIOA Title I funding benchmarks that require a certain amount of Title I funding to be used for training each year. In Program Year (PY) 2016, at least 30 percent of Title I funding must be directed towards training, of which 50 percent must be spent on low income

individuals and individuals with other barriers to employment. By 2018 and every year after, the standard is raised to 50 percent and 70 percent respectively. While the importance of assisting low income individuals and individuals with other barriers to employment is undeniable, this benchmark system has the potential to result in unintended consequences, especially in rural areas. Specifically, these expenditure requirements may result in the closing of offices which provide important employment services, increasing travel time for customers and limiting access to valuable resources. Furthermore, these across–the–board spending targets create a "one–size–fits–all" approach that disregards local demographics, challenges, and economic conditions. It may be beneficial to this process to highlight the specific provisions of WIOA which underline Congress's intent to clearly assign roles to states and local workforce development boards. Section 101(d)(12) of WIOA outlines the responsibilities of the state board, which include developing policies to promote statewide objectives and improving the performance of the state workforce development system. Additionally, pursuant to Section 107(d) of WIOA, local elected officials, in conjunction with local boards, should be charged with setting policies, approving budgetary line items, and determining financial priorities based on local conditions. I firmly believe that regional and local autonomy will be a key factor to the success of this landmark legislation. Thank you for your comprehensive approach to improving the experiences of residents, employers and consumers within the state of Pennsylvania. I am confident that we can work together to improve the commonwealth's workforce strategy over the next four years. I respectfully request that you take this submission as well as those of key stakeholders across the state into consideration as you prepare to release the final version of Pennsylvania's Workforce and Investment and Opportunity Act Combined State Plan. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. James Decker of the Warren County Chamber of Business & Industry offered multiple comments to include: • Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment) Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5–10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify) NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1–B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining. Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted. • Employer Services (p. 24–25) (p.67) and throughout the plan A definition

of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. Response: We appreciate the comment and recognize some subjectiveness in the term "high–quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full–time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high–quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high–quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. • Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table) While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or law wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made. Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released. • High Priority Occupations (HPO) List and High Turnover Positions (p. 24–25) It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positons where the turnover is low. Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. • Workforce Development System–Alignment Strategy (p. 29) This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site. Response: We appreciate the comment in support of this effort. Joan Stitzinger of the Warren Forest Higher Education Council offered multiple comments to include: • The plan does not recognize the Community Education Councils of Pennsylvania and the work they do within the rural areas of the Commonwealth to make education and training available where no education/training services exist. The CECs have been in existence for over 35 years and are an integral part of their rural communities with funding provided through PDE. As such, Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: o Page 39–44 Alignment with Other Partner Programs: The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the

Commonwealth to increase the education and training delivery to residents of rural communities. o Page 51–53 Leveraging Resources to Increase Educational Access: The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of education and training programs based on identified need and demand. o Page 53 under the heading Improving Access to Postsecondary Credentials: The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing education and training opportunities. Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53. Mary Stiller of the Washington County Chamber of Commerce commented: The chamber strongly believes the local elected officials, and their boards, are in the best position to understand the needs of their communities and how to best meet those needs. We support giving local officials the flexibility to develop local budgets and determine program funding levels, while giving priority to those with barriers to employment, as the law requires. We support increasing the quantity and quality of online, self–service options to business and job seekers in the Commonwealth. However, it is important to recognize that there are some areas in the state, including Washington County, that do not have access to broad band services. In addition, there is a population of jobseekers that do not have strong technology skills or access to computers. In many cases, online services would not have the same employment success rate as face–to–face career coaching, hands–on training and mentoring. The chamber supports retaining physical locations and in–person programming to successfully service the needs of all Pennsylvanians. We respectfully submit these comments for your consideration. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in–person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology. Lucyann Vierling of the Wayne Pike Workforce Alliance offered multiple comments to include: • As designated by the Pennsylvania Department of Education, Community Education Councils (CECs) provide educational access to more than 1 million residents in a geographic region encompassing 31% of land mass in the Commonwealth. CECs are an aligned, collaborative partner that strategically shares the workforce development goals of the Commonwealth. The inclusion of CEC partner activities within the Combined State Plan demonstrates another cohesive attribute the Commonwealth provides to ensure the attainment of said goals. Recommended Insert (s) into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: o Page 39–44 Alignment with Other Partner Programs: The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities. o Page 51–53 Leveraging Resources to Increase Educational Access: The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non–existent. CECs serve as an intermediary and broker of training programs based on identified need and demand. o Page 53 under the heading Improving Access to Postsecondary Credentials: The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities. Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53. Debra Donahue of the West Central Job Partnership offered multiple comments to include: • Training Benchmarks: WIOA places a much greater emphasis on serving individuals with

significant barriers to employment (educational barriers, Basic Skills Deficient, low income, etc.). It is imperative that those barriers are eliminated before individuals are successful in training. Before arbitrary percentages are required to be spent on direct training, some baseline needs to be established to determine the need for “pre–training” assistance to eliminate barriers prior to moving individuals forward to training services. The current method of collecting data to calculate the percentage of monies spent on direct training only includes Title I dollars and does capture money spent on training from Rapid Response, Trade, OJT NEG, TANF, other federal dollars, etc. For example–NEG OJT grant monies could only be spent on training, so all long–term OJTs were written under this grant and other WIA dollars were utilized to cover rent, staff costs, etc. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. • It is not clear if the local and regional performance rates are going to be one and the same. Local economic conditions may vary within a region due to uneven growth, therefore, performance rates should be negotiated locally and not for the region as a whole. Response: Section 677.20 of the Notice of Proposed Rulemaking states that each local area in the region will establish performance levels through a negotiation process prior to the start of the program year. • Currently, attainment of a credential equates to earning a high school diploma, GED, Associate or Bachelor degree. Credential has yet to be defined, but should include industry–recognized certificates of completion and credentials such as Manufacturing Skill Standards Council’s (MSSC) Certified Production Technician (CPT), American Welding Society (AWS) welding certificates, and others. Response: We appreciate the comment and note that we await the publishing of final WIOA regulations in terms of defining credentials. Multiple employees from the Westmoreland Country Blind Association offered comments to include: • My name is Brandon sheets. I work at Westmoreland county blind association, which is an organization that is an affirmative employer of people with disabilities. My work is important because I like the work that I do here. I choose to work here because I fit in and people respect me. If I didn’t have this choice, I would be upset. Please allow me to have a choice. • My name is Carol Yusko. I work at the Westmoreland County Blind Association located in Greensburg, pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I see my friends. I choose to work here because I feel safe here. If I didn’t have this choice I would have to stay at home. • My name is Rocco Salcciccioli. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I box up paper, and work with my friends. I choose to work here because I like it better. If I didn’t have this choice I would get a new job. • My name is Jack Shomo. I work at Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because pulling paper making money. I choose to work here because I like it, my friends are here. If I didn’t have this choice I don’t know. • My name is Matt Butler. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it gives me something to do. I choose to work here because it’ easy going here. If I didn’t have this choice I would just sit at home all day. • My name is Christy Ciarriomboli. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like to pull paper with my friends. I choose to work here because this is the only job I can have. If I didn’t have this choice I would stay home. • My name is Mark Quist. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I destroy documents and papers. I choose to work here because there are more people here to help me if I have a seizure, and it makes me feel safe. If I didn’t have this choice, I would I really don’t know, I couldn’t say. • My name is Mike Kissel. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like it here.

I choose to work here because it is educational. If I didn't have this choice, I would just stay home. • My name is Ricki Leone. I work at The Westmoreland County Blind Association located in Greensburg, Pa. This is an organization that is an affirmative employer of people with disabilities. My work is important because I learn life skills I can use everyday. I choose to work here because I a comfortable here. I love my staff and friends that I can relate too. I have tried working at McDonald's before and it didn't work. • My name is Desiree Miller. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I see my friends and we have parties. I choose to work here because I have friends and the staff helps me. If I didn't have this choice, I would be very sad. • My name is Calvin Wigfield. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I meet new people. I choose to work here because I like shredding and doing all the jobs here. If I didn't have this choice, I would try to find another job shredding. • My name is Teresa Bolam. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 105601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it keeps me busy. I choose to work here because I like it here. If I didn't have this choice, I would I just don't know. • My name is Shawn Stape. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it pays good. I choose to work here because all of the people here, I like them. If I didn't have this choice, I would just stay home. • My name is Justin Geier. I work at the Westmoreland County Blind Association located in Greensburg, Pa.15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it gets me out of the house. I choose to work here because I feel safe, and enjoy the people. If I didn't have this choice, I would really not know what I would do. • My name is Autumn Self. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I love to make friends. I choose to work here because I love the people here, It's a fun place, and I feel safe here. If I didn't have this choice I would try to get a job from home, working over the phone or something. • My name is Bret Gulisek. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it keeps me busy and I have a lot of friends here. I choose to work here because I get to meet new people and get to do many different jobs to do. If I didn't have this choice, I would probably stay home. I tried the ARC, RCW, Paula Teachers, and I like it here. I don't feel like an outcast, there is no abuse here. I feel safe. • My name is Kristine Bastl. I work at The Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because my friends are all here. I choose to work here because I like it here. If I didn't have this choice I would have to get another job. • My name is George Norcera. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because all my friends are here. I choose to work here because it's fun, my friends are, and to make money. If I didn't have this choice, I would find another job. • My name is Alex Morrison. I work at The Westmoreland County Blind Association, located in Greensburg, Pa. 15601. This organization that is an affirmative employer of people with disabilities. My work is important because I like the people here. I choose to work here because All my friends are here. If I didn't have this choice, I would probably just stay home. • My name is Carol Pilch. I work at the Westmoreland County Blind Association located in Greensburg PA 15601. This is an organization that is an affirmative employer of people with disabilities. This is a home environment for the people who choose our facility. It is a comfort zone for them and they build their confidence in knowing their job. It is very consistent for them. If they should be put out into the mainstream it would be very overwhelming and different everyday. They need consistency!! • My

name is Cindy Morrow. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like to make money. I choose to work here because I think this is a good place to work and I'm comfortable with my setting. If I didn't have this choice, I would be out of a job. • My name is Sharon Goodlin. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people of disabilities. My work is important because I need to make money to go out with friends. I choose to work here because all my friends are here and I enjoy what I do. If I didn't have this choice, I would be bored at home and would want to move closer to my family. • My name is George Kozar. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because of my friends and it's good work. I choose to work here because I just like it here. If I didn't have this choice, I would go to the arc. • My name is Steven Fekete. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like being with friends. I choose to work here because I make more money. If I didn't have this choice, I would get a job at RCW. • My name is Mike Daley I work at The Westmoreland County Blind association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it gives me fulfillment, and we prepare documents to be destroyed, and eventually they get destroyed. I choose to work here because I have friends and I can do the work. If I didn't have this choice, I would, at my age probably retire.

• My name is Raymond Kargle. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because we help the military. I choose to work here because you treat me better than the other places. If I didn't have this choice, I would retire. • My name is Stephon Short. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like the work. I choose to work here because my team wanted me here. If I didn't have this choice, I would try to get a job at another workshop. • My name is Georgeanne Malesky. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like working here. I choose to work here because I make other friends. If I didn't have this choice I would be sad. • My name is Terry McCafferty. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because of the pay. I choose to work here because of the staff. If I didn't have this choice, I would have to find a job with another workshop. • My name is Erica Panichella. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like working here. I choose to work here because the people are friendly. If I didn't have this choice, I would feel sad and mad. • My name is DeAnn Wallbaum and I work for The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. I have been on both sides of this debate. Pre–voc versus Employment at various places earning minimum wage. I was a manager for 20 years at a fast food restaurant in which we employed various people with various disabilities. They had job coaches that would come with them and show them how to perform their jobs. For some they loved it for others they had a hard time with the demands of the job and would often times display inappropriate behavior which would eventually cause them to have to be replaced. When I came here to work in a pre–voc atmosphere I could not believe how much a program like this helped individuals with disabilities become more independent. The structure of this pre–voc is designed for each individuals needs versus being in a minimum wage job which no matter what the individual

disability is everyone is classified the same. When in reality no 2 individuals are the same with disabilities. There will be a lot of clients here that will be distraught if they had no pre–voc to attend. There would be so many of them that will not be able to function in society at a minimum wage job. So they will be left only to stay home and all their sense of independence will disappear. Why would we want to take that away from them!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!! • My name is Donna Opsitnick. I work at the Westmorland Blind Association located I Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. I feel that this organization should remain open for the fact that a lot of these people would not have any structure in their lives if it is closed. Many people depend on the facility for socialization and just getting away for the day to work in a group environment. They love it here just as we love having them come on a daily basis. So please let's keep it gone for the sake of these people. Where would they be if facilities like this are not available. • My name is Rebecca Labuda. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. Without the workshop, I believe there would be limited choices on where these individuals could work. Those with limited communication skills and intellectual disabilities, need supervision that could not be found with competitive employment. Hopefully there is much reconsideration on such a change that would affect many. • My name is Raymond Smith. I am employed by the Westmoreland County Blind Association located in Greensburg, PA 15601. WCBA is a Pennsylvania non–profit organization that is a committed affirmative employer of people with disabilities. I offer personal testimony to the care and compassion we provide in addressing the needs of those who are afflicted with physical and mental challenges. It is each individual's obligation to be "a voice" for those who otherwise have none. Due diligence and great thoughtfulness, must precede any actions that could manifest itself into a life changing event for those who depend on us. I ask for your kind and thoughtful consideration in attending to the positive needs of our clientele. • My name is Patricia Leasure. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I can make a difference to my company. It give me the opportunity to do many jobs in which I otherwise would not be able to do! If I didn't have this choice I would not be able to just run out anywhere and get a job. • My name is Dawn Lynn, & I work at Westmoreland County Blind Association located in Greensburg, PA. This is an organization that is an affirmative employer of people with disabilities. I feel that this facility should remain open for the people and children here, so they have structure, guidance and a place where they can remain active! The people and children look forward to coming here everyday, and working with others. So, please find it in your heart (and budget) to keep these places open! Thank you so much for your time, help, and consideration with this matter. Response: We appreciate the commenter's sentiments. New requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate. We cannot say at this time whether these federal changes will adversely impact these individuals' current situations. Patrick Gerity of Westmoreland Country Community College offered multiple comments to include: • Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006: 1. Recommend that the Commonwealth separate Perkins from the state's combined WIOA plan as follows: o The benefits of combining Perkins grant funds with the state WIOA plan is unclear. o The inclusion of Perkins with the WIOA plan will impose an additional bureaucratic structure with an increase of paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers because the WIBs will add their administrative costs. o There is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to WIOA bureaucratic overhead denies students and clients of the necessary and essential support services. o The current administrative structure of Perkins at PDE is effective and

efficient o The Perkins grant legislation is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may delay reauthorization even further and make it more difficult to comply when reauthorization is finalized. o Community colleges have a strong working relationship with PDE relative to the administration of Perkins funds. It is already a requirement in current Perkins legislation to include at least one representative from your local WIB on the mandated Perkins Participatory Planning Committee (PPC). Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. The federal Perkins regulations mandate the current performance measurement indicators and are not able to be changed until Perkins is reauthorized. Perkins regulation did allow for local negotiations. • Do KEYS staff have any suggestions (see bottom of page 39, top of page 40, middle of page 53) o Including KEYS with the WIOA state plan will impose an additional bureaucratic layer and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers because the WIBs will add their administrative costs.. o The current administrative structure of the statewide KEYS Program is effective and efficient. o The Keys Program bill has recently been established as state law making KEYS a statutorily mandated program. It was folded into the Welfare code amendment bill that supplemented the budget. We have heard that implementation may include expansion of the program to state universities as well as career and technical schools. During a statewide KEYS Program conference call this morning, we were told that the Statewide allocation for KEYS will be level–funding for next fiscal year. The aftermath of this recent legislation coupled with the WIB possibly receiving administrative costs from KEYS would certainly be detrimental to the established KEYS Programs at PA's community colleges. The existing statewide funding allocation would be spread throughout additional agencies decreasing the amount of funds available to PA community colleges. Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program. Diane Barush of Wilkes–Barre Area CTC Practical Nursing commented: I am the Clinical Coordinator at the Practical Nursing program at Wilkes–Barre Area Career & Technical Center. I act as the Perkin's grant administrator for a consortium of practical nursing programs in our area. I have reviewed the Pennsylvania's WIOA Combined State Plan as requested but I am finding it very difficult to provide constructive commentary as I am very unsure of the exact effect the plan will have on our school. Our consortium utilizes Perkins funding to facilitate education for many disadvantaged and nontraditional students so this is certainly a very important topic. I am not able to attend the public meetings, however I do request further clarification on exactly how the proposal will change the current process. Response: Perkins recipients must continue to meet the federal Perkins regulation and use the Perkins funds as mandated. At this time the US Department of Education has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. PDE is not able to provide additional guidance or analysis on the combined WIOA plan until USDE provides their guidance. PDE will continue to work with all Perkins recipients as guidance is released. Dave Zartman of Zartman Construction, Inc. offered multiple comments to include: • I am the immediate past chair of the Central Pa Workforce Development Board. I would like to address areas identified in the state plan that are of concern as written and offer recommendations that I believe support the Governor's goals outlined in the plan while allowing the local flexibility afforded throughout the Workforce Innovation and Opportunity Act. Page 10, Section 2.1 of the plan sets a mandate for progressively spending 30, 40, and 50% of the Title I monies on training including a minimum of training on 70% of customers with barriers to employment over the next three years. While we support an increased emphasis on training, we currently don't have a waiting list for training priority

of service individuals, even without minimum training expenditure thresholds. With this minimum expenditure requirement, we could end up having to spend much larger training amounts on fewer clients while other needs go unserved. If this minimum expenditure requirement stays in the plan, the local boards, especially in rural areas, would need to significantly redirect spending. The most likely locations those monies would come from are Title I staffing and PA CareerLink® facilities. The Central Workforce Development Area currently covers nine counties with only six PA CareerLink® offices. Closing any one of our locations would impose significant increases of travel distances creating a barrier for both jobseekers and businesses. If the minimum training expenditure requirement stays in the plan, please define what constitutes training so we know what counts towards the goal. A very rigid definition is likely impractical to accomplish; however if training is broadly defined and includes items like PA CareerLink® services that increase the job readiness skills of jobseekers and workshops provided specifically for training business customers, it will help local areas meet the Governor's training goals. Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non–Title I funds to meet the training targets. The revised language notes that a policy will be issued to include a definition of "training." • Page 68 of the plan requires that 70% of the clients be priority of service clients. I agree priority of service clients should be first in line but to require a rigid percentage doesn't make sense. By our calculations, we would have needed to turn away services to 1,400 non–priority of service clients this past year to meet that threshold. Are we to tell them we met our quota and we can't help you? To me this would apply with any mandate on the percent served. Please consider setting a goal for increasing services to priority of services clients allowing each local area to establish its own thresholds based on the needs of the local population. Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. • Page 16, Section 4.4 of the plan includes language that we spend a certain percentage of workforce development board monies on industry partnerships. This would be an unfunded mandate. If local boards are to provide financial support for industry partnerships, it is recommended the state distribute industry partnership funding to all local workforce development boards from the state's industry partnership funding in the state budget. This would support training for incumbent workers and local businesses without putting additional financial constraints on WIOA Title I resources. Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training. • Overall, I feel the federal government with the passage of the WIOA gives the local areas autonomy making the decisions necessary to provide service to their population. There are vast differences across our state and the needs of each WDB are different. The state plan in its current form will restrict that autonomy to the detriment of our clients. There are also parts of the plan that would improve the system including data sharing and working together across state agencies. I am just looking to have the final document be workable for all parties. Thank you for the opportunity to provide comments. Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. Joanne Laub offered multiple comments to include: • I appreciate the efforts of those who have worked hard to develop policy regarding implementation of the federally mandated WIOA in Pennsylvania. I realize that there are many challenges that the federal policy has provided, including the challenges to the Commonwealth of Pennsylvania. Governor Wolfe's plan has defined many admirable goals including the collaboration of data sharing among organizations as well as the more effective use of data in individual organizations and across different organizations. The first goal of improving workforce development across state agencies is clearly an objective that government agencies should strive for. State agencies should work together to leverage resources to achieve the federal government's and the state's (including the Commonwealth's) strategic visions. These collaborations should also

include employers and educational institutions, including non–profit institutional agencies. The policy often cites PA CareerLink as a strong resource for support for those who are striving to enter the workforce. I personally am skeptical about the PA CareerLink bureaucracy as I have seen people who have been striving adult learners who want to move themselves forward in the job force network, but have been stymied by the CareerLink requirements of individuals to participate in the program. Streamlining this agency to provide a more practical pathway could help the Commonwealth and the unemployed progress to achieve better employment goals. Response: The commonwealth will consider ways to better streamline the PA CareerLink® system to increase employment opportunities. • One of the goals of the Commonwealth's plan is to establish career pathways. This is also a laudable goal, and the policy states the career pathway combines education, training, counseling and support services from multiple programs. In addition, strategic partnerships between employers and educational institutions is crucial. Barriers to unemployment including post–secondary credentials and certifications have been identified. Unfortunately, one aspect that has been clearly overlooked is that since 2014, obtaining a high school equivalency (or GED) has become increasingly difficult, especially for those that we are striving to serve. Not only has the GED become unobtainable for so many, but it has also become a more commonplace requirement for all jobs, including jobs where it is not necessarily relevant. This policy, like many other entrenched policy decisions, is difficult to overcome. In order to advance the prospects of at–risk individuals, reducing the required scores to obtain the GED or reducing the employer requirements of having a GED would help many hard–working individuals who need GED credentials to obtain or continue to perform in the jobs that they have been capably performing, would help improve the career pathways of hard working people who strive to succeed but are eliminated by the current regulations. Response: The commonwealth has no mandate over employers and what skills and credentials they require of a prospect. It is also noted that the commonwealth does not set the passing scores for high school equivalency exams including the GED. • I am sure that there is general agreement that increased work based learning opportunities for youth and educational opportunities for those who are dedicated is optimal. I hope that the Commonwealth does not ignore the individuals who are out of work based on requirements that are based mostly on lofty and bureaucratic policy concerns. Obviously, like the legislature, I have expressed mostly ambitions rather than practical solutions, but I hope that I have helped convey my position. Please consider the people that you are serving and how to attain both economic and human goals. Thank you for your consideration, and thank you for your efforts to improve many lives. Please look beyond political arguments and come to a conclusion that will help the Commonwealth move forward. Thank you for your consideration. Response: We appreciate the comments. Rookie2476@yahoo.com commented: No matter what hat I wear, OVR consumer, OVR CAC Member, Board Member, or Independent Living Specialist, my biggest concern by far is the lack of reference between the working relationship between Center's for Independent Living and OVR. I have personally been a part of this system since 1994 and when OVR and Centers for Independent Living have a good working relationship and they focus on their strengths individuals reach their goals. In the 90's and early 2000 the Washington district OVR office was 1st in the state in job placement. During that time period there was an ongoing collaborative effort between OVR and the local center for independent living to work with individuals with disabilities. Being too vague and not having requirements benchmarks and accountability will simply allow the same practices to continue. In the end this will only hurt the employment goals of people with disabilities state wide. Independent Living skills, resources and practices compliment Vocational services and are available if someone is not eligible for vocational services. A working relationship and referral process is key to successful vocational goals, and will greatly reduce the amount of individuals who fall through the cracks. Response: We appreciate the comment. We agree that the CILs are a valuable partner and will include the CILs in the section on partner programs.