

Multi-Year Plans

June 4, 2019

ACCESSIBILITY: Workforce publications and forms are available on Pennsylvania Department of Labor & Industry website for [download](#).

Area of Responsibility: BWDA/Policy Coordination

Certified by: BWDA/PC
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This policy provides instructions and technical guidance to planning committees, chief elected officials, local workforce development board, or LWDB, members, other executive decision-making officials of required and additional one-stop system partners and applicable staff (e.g., LWDB executive directors) regarding the preparation, development, submission and approval of regional and local area plans and modification of such plans. These planning documents reflect Pennsylvania’s continuing efforts to articulate multi-year planning requirements, a phased approach to implement the administrative and operational elements of the Workforce Innovation and Opportunity Act, or WIOA, and its related regulations and guidance.

Summary of Changes

- On May 5, 2017, L&I issued Workforce System Policy No. 108-01, *Regional/Local Planning – Multi-Year Plans*. Consideration of the effort and resources used to create the current plans was considered when developing this policy change. All questions for the original policy were maintained, as well as the order they are presented. Time has elapsed since the approval of the Multi-Year plans; therefore, there may be some changes to the accompanying set of *minimum expectations* paired with each question. Wherever changes have been introduced, they will be indicated within the template as such. This change incorporates the following revisions:
- This section, *Summary of Changes*, was added to reflect the changes from the original policy;
- Section III (previously section VI), *Background*, section indicates –
 - Pennsylvania’s PY 2020 – 2023 WIOA Combined State Plan information
 - Governor’s decision to offset the PY 2020 - 2023 WIOA regional and local plans by one year
 - Reasoning behind why existing WIOA regional and local plans must be modified
- Section IV (previously Section V), *Deadline*, has been revised to account for the WIOA required modification
- Section V (previously Section VI), B. *Plan Components*, has been revised.
- Sections VII (previously Section VIII, A. *Regional Plans*, and B. *Local Area Planning*, both contain a new bullet that was added, “At a minimum, review the regional (or local) plan two years after its effective date and submit a plan modification as described herein.”
- Section XI (previously Section XII), *Plan Extension and Modification*, was enhanced
- L&I’s *WIOA Regional or Local Plans Modification Form* has been updated and is posted with this policy
- Section VIII, *Public Comment Period*, was modified to include public notice requirements
- Section IX, *Plan Submission and Approval*, “Public Posting of Approved Plan” was added

- I. **References and Resources.** *Appendix A* is a list of the reference and resources used to develop this policy. These provide additional information that may support policy implementation.
- II. **Definitions.** *Appendix B* is a list of definitions for terminology used throughout this policy.
- III. **Background. (Revised)** WIOA sets parameters for state, regional and local workforce development systems throughout the country, mandating resource sharing and alignment of priorities across multiple systems, programs, partners and providers to ensure a skilled workforce today and in the future. As described in Pennsylvania’s *WIOA Combined State Plan*, workforce development systems in Pennsylvania will invest in innovation, employer engagement, accountability structures and improved data to create a comprehensive workforce development system consistent with the governor’s strategic vision. Collaboratively developed plans are best positioned to accomplish PA’s goals, and transcend the fragmentation of workforce development programs.

Both the regional and local area plans provide the framework in defining how a designated area’s workforce development system will achieve the purposes of WIOA. Such action plans develop, align and integrate the area’s job-driven workforce development systems, and provide the platform to achieve the area’s vision, strategic goals and operational deliverables. Because a plan is only as effective as the partnerships that implement it, these plans require a shared understanding of an area’s workforce investment needs, a shared vision of how the workforce development system can be designed to meet those needs, and a shared agreement on the key strategies to realize this vision. While both plans identify and describe related activities and concepts, regional and local area planning do so from notably different vantage points.

The Pennsylvania Department of Labor & Industry, or L&I, in consultation with chief elected officials, LWDB members, and other executive decision-making officials of required and additional one-stop system partners, created a phased approach to the regional and local planning requirements. This two-part approach required system stakeholders to collectively prepare and submit a transitional regional and local area plan for PY 2016 to serve as the foundation for the development of a more robust multi-year regional and local area plan for PY 2017 through PY 2019. This adaptation was developed in consideration of the shift in the planning requirements of the Workforce Investment Act of 1998, or WIA, to those required by WIOA, intended to promote integrated planning and system alignment, to ensure compliance with federal and state laws, regulations and policies, and to support the strategies described in the *WIOA Combined State Plan*.

The effective date of the *PY 2020 – 2023 WIOA Combined State Plan* is July 1, 2020. There is a recognition of a mutual desire for greater collaboration between workforce system stakeholders and the PA Workforce Development Board, or PAWDB, to create the *PY 2020 – 2023 WIOA Combined State Plan*. LWDBs and other local area stakeholders indicated the requirement of an approved *WIOA Combined State Plan* in the drafting of strong integrated and aligned WIOA regional and local plans. After consultation with PAWDB and U. S. Department of Labor Employment and Training Administration, or ETA, the Governor decided on a course of action that would extend all current WIOA Multi-Year regional and local plans to June 30, 2021. This action will permit more active *WIOA Combined State Plan* collaboration amongst all stakeholders while providing sufficient time for regional/local planners to reflect the state plan’s vision, goals and strategies within their respective regional/local plans.

To accomplish these important objectives, WIOA regions and local areas must modify their respective WIOA plans and receive L&I’s approval by December 31, 2019. This action must occur because WIOA requires four year plans to be reviewed and modified accordingly every two years. The WIOA PY 2016 transitional plans and multi-year PY 2017 – 2019 plans were approved due in part to the strategic transition from the WIA planning requirements thus the need to perform a two-year modification review was lifted. To accommodate the PY 2017 – 2019 (henceforth denoted as “PY 2017 – PY 2020”) WIOA Multi-Year regional and local plans one-year extension, all WIOA Multi-Year regional and local plans must be reviewed and modified to meet this WIOA requirement. Once approved, the PY 2017 – 2020 WIOA Multi-Year regional and local plans will be effective through June 30, 2021. The changes to this policy largely reflect this requirement and provide updated guidance leading to approved PY 2017 – 2020 WIOA Multi-Year regional and local plans.

- IV. **(Revised) Deadline**. The submission deadline for the modified WIOA multi-year plans is October 1, 2019.
- V. **Multi-year Regional and Local Area Plan Composition Guidance**.
- A. ***Introduction***. Each regional plan, along with all associated local area plan(s), must be submitted to L&I as a unique, separate document. Due to L&I's email system restrictions the point of contact must ensure that any emails submitted must not exceed a maximum of 10 megabytes. It follows that separate plan documents are not to exceed a maximum of 10 megabytes.
- B. **(Revised) *Plan Components***. Multi-year regional and local area plan fillable templates can be found on L&I's website just below the policy. Plan drafters must first download the templates to input their unique information. **(Added)** When developing a modification to the regional and local plans, staff may modify their existing plans accordingly.
- VI. **Region**. A region, used without further description, is an area identified by Pennsylvania in accordance with WIOA section 106(a). L&I has designated the Pennsylvania Department of Community and Economic Development's, or DCED, ten Partnerships for Regional Economic Performance (PREP) regions as workforce development regions. There are five planning regions and five single local area regions. **(Added)** According to the requirements established in the previous policy regarding the WIOA Transitional Plan (PY 2016) and Multi-Year Plan (PY 2017 - PY 2019), staff were required to prepare and submit regional plans for all regions. The modification of current plans will maintain this requirement.
- A. ***Planning Region***. A planning region is a designated area that is comprised of two or more local workforce development areas, or LWDAs, that are (collectively) aligned within a region. In Pennsylvania, there are five designated planning regions: Northeast, Northwest, South Central, Southeast and Southwest.
- B. ***Single Local Area Region***. A single local area region is a designated area that is comprised of a single LWDA. In Pennsylvania, there are five such regions: Central, Lehigh Valley, North Central, Northern Tier, and Southern Alleghenies.
- VII. **Multi-Year Regional Planning**.
- A. **Regional Planning**.
- Regional Partnerships***. Workforce system stakeholders must consider the promotion of more robust regional partnerships for general effectiveness purposes, and the development of regional planning committees for the specific purpose of the regional planning process. Regional partnership, to include intra-regional collaboration, facilitates alignment of workforce development activities with regional economic development activities, and better supports the execution and implementation of Sector Strategies and Career Pathways, with the likelihood of increasing public returns on investment. Regional cooperation may also lower costs and increase the effectiveness of service delivery to businesses that span more than one local area within a region and to job seekers through coordination of shared services, processes and operations. Regional partnerships must include the region's collective core program partners, and should include the required program partners throughout the designated area.
- Regional Discussions and Planning Committees***. Workforce system stakeholders must consider the development of regional planning committees for the specific purpose of the regional planning process. The regional plan is essentially a discussion of the strategies within a region provided in written narrative that focus on strategic alignment and coordinated and collaborative efforts.
- Regional Plans***. Each local board, their respective chief elected officials, as well as other local workforce system stakeholders within an identified region must:

- 1) Collaborate with the applicable stakeholders within their respective planning region to prepare, develop and submit a multi-year regional plan for PY 2017 through PY 2020. A multi-year regional plan fillable template will be provided on the L&I website along with this policy. *Appendix C: Multi-Year Regional Plan Instructions*, provides guidelines for comprehensive, multi-year regional planning and instructions to address each required question, as well as the documents and information that must be included.
- 2) Prepare, submit and obtain approval of a regional plan that:
 - Satisfies the requirements of WIOA Section 106 and Section 108; 20 CFR Part 679 Subpart D; and this policy as determined by L&I;
 - Provides an opportunity for public comment, consistent with Section X, *Public Comment Period*, on the development of the regional plan (or subsequent plan modifications) before submitting the plan to L&I (for additional requirements review the *WIOA Regional or Local Plans Modification Form*);
 - Incorporates local plans for each of the local areas in the region; and
 - Make information about the plan available to the public on a regular basis through electronic means and open meetings.
 - **(Added)** At a minimum, review the regional plan two years after its effective date and submit a plan modification as described herein.

B. Local Area Planning.

Local Partnerships. Local workforce system stakeholders must consider more robust partnerships for general effectiveness purposes. Local partnership, to include core, required and additional partners, facilitates alignment of workforce development activities with a local one-stop system and better supports the execution and implementation of local strategies and initiatives with the likelihood of increasing public returns on investment. Local cooperation may also lower costs and increase the effectiveness of service delivery through the coordination of shared services, processes and operation.

Local Discussions and Planning Committees. Workforce system stakeholders must consider the development of planning committees for the specific purpose of the local planning process. The local plan is essentially a discussion of the implementation of cross-partner and cross-program strategies within the local area provided in written narrative that focuses on program alignment.

Local Plans. The local board, its respective chief elected official(s) and other executive decision-making officials of required and additional one-stop system partners [WIOA Section 107(d)(3)] within the region must:

- 1) Collaborate with the applicable stakeholders within the local area to prepare, develop and submit a multi-year local plan for PY 2017 through PY 2020. A multi-year plan fillable template will be provided on the L&I website along with this policy. *Appendix D: Multi-Year Local Area Plan Instructions*, provides guidelines for comprehensive, multi-year local planning and instructions to address each required question, as well as the documents and information that must be included.
- 2) Prepare, submit and obtain approval of a local plan that:
 - Satisfies the requirements of WIOA Section 108; 20 CFR Part 679 Subpart D; and this policy as determined by L&I. The local board and chief elected official(s) must jointly approve the local plan.
 - Supports, and is consistent with, the vision, goals and strategy as described in Pennsylvania's WIOA Combined State Plan
 - Provides an opportunity for public comment, consistent with section X. *Public Comment Period* on the development of the local plan (or subsequent plan modifications) before submitting the plan to L&I. Review the *WIOA Regional or Local Plans Modification Form* for additional requirements.
 - Make information about the plan available to the public on a regular basis through electronic means and open meetings.

- **(Added)** At a minimum, review the local plan two years after its effective date and submit a plan modification as described herein.
- 3) In both instances, wherever a local area is designated to be part of a “Planning Region” or is a designated “Single Local Area Region”, a local area plan must be developed by the local boards and their respective chief elected official(s), in alignment with the regional plan (see *Appendix C: Multi-Year Regional Plan Instructions*) and submitted as a component of that regional plan.
 - 4) Local areas also designated as a “Single Local Area Region” need to be mindful of the unique position they are in as the geographic borders for the region and local area are the same. Consequently, due to the nature of the regional plan questions, the local area plan will occasionally request answers that are similar, if not the same, as what was required in the regional plan. The answer does not need to be duplicated in the local area plan. As such, the *Appendix D: Multi-Year Local Area Plan Instructions* have been edited to guide “Single Local Area Region” local area plan drafters to be aware when these instances occur.

VIII. Public Comment Period. Public comment provides an opportunity for all stakeholders to provide input and feedback on all facets of a local plan and a regional plan. To allow for adequate opportunity for such comment, local boards must:

- Make copies of the proposed regional or local plan (or subsequent plan modification) available to the public through electronic and other means, such as public hearings and local news media;
- Publish the proposed plans on the local board’s website;
- Ensure that proper public notice is provided, see *WIOA Regional or Local Plans Modification Form*;
- Include an opportunity for comment by members of the public;
- Provide a 30-day period for comment on the plan or modification before its submission to L&I, beginning on the date on which the proposed plan is made available; and
- Submit any comments that express disagreement with the plan, as well as the action taken by the local board in response to the comments, along with the plan.

Note: The regional plans, and their associated local area plans must be posted as one cohesive document for a *30-day period of public comment*. Notification of the posting must be made simultaneously to all relevant regional and local area stakeholders, as well as to L&I.

IX. Plan Submission and Approval.

A. Submission. All regional and local area plan packages must be submitted electronically to the Bureau of Workforce Development Administration (BWDA) Policy Coordination resource account at RA-LI-BWDA-Policy@pa.gov by close of business on the deadline indicated in this policy.

All regional plans, along with all associated local area plans, must be emailed by a regionally designated single POC. A copy of the email must be sent to all LWDB chairpersons and chief elected officials within a region or LWDA and contain the subject line “[Region Name] WIOA Multi-Year Regional Plan.”

B. Approval. Plan(s) submitted to L&I are considered approved if:

- L&I provides the regional POC with a notification of approval; or
- At least ninety (90) days has passed since the submission of the draft plan without the regional POC receiving any communication from L&I.

L&I may choose not to approve a draft plan submission for any of the following reasons:

- Deficiencies in workforce investment activities are identified in the region or local area and the designated area has not demonstrated acceptable progress in implementing corrective actions;
- The plan does not comply with the applicable provisions of WIOA, its regulations and 29 CFR 38;
- The plan does not align with the PA WIOA Combined State Plan (PY 16 to PY 20);

- The plan does not include local plan submissions from the local board(s) within the workforce planning region; or
- Other reasons as L&I may determine appropriate.

C. **(Added) Public Posting of Approved Plan:** Local boards must publicly post their approval letter, approved regional and local plans and supplemental plan information (i.e. local area’s WIOA Title I Performance Measures, Local Workforce System Organizational Chart and One-Stop System Program Partner Contact List) on the local board’s website. It is noted that supplemental plan information will not require plan modification approval as it is expected the local board will make timely revisions to the supplemental plan information. Additional posting instructions can be located within L&I’s *WIOA Regional or Local Plans Modification Form*.

X. **Structure Exceptions.** Consistent with Workforce System Policy (WSP) No. 02-2015, *Local Governance*, Dec. 15, 2016, those local areas that require a structure exception, must include such narrative within the local plan. See *Appendix D: Multi-Year Local Area Plan Instructions; Question #3.1*.

XI. **(Revised) Plan Extension and Modification.** WIOA requires a plan modification at any time when underlying conditions shift or if plan elements are no longer valid, see WIOA sections 102(c)(2) and 108(a). Additionally, the Governor has determined that the PY 2017 – PY 2019 WIOA Multi-Year plans will be extended one-year to ensure that workforce stakeholders may be afforded the opportunity to collaborate with the drafting of the PY 2020 to PY 2023 WIOA Combined State Plan and to assure that such plan is considered in the drafting of PY 2021 – PY 2024 WIOA Regional and Local Plans; therefore, so as to be complainant with 20 CFR Part 679, all current regional and local plans must be reviewed and appropriate modification completed. All PY 2017 to PY 2020 WIOA Multi-Year plans modifications will be summarized within *L&I’s WIOA Regional or Local Plans Modification Form*; the modification form is posted on the L&I website with this policy.

XII. **Technical Assistance and Inquiries.** To ensure a successful process in the development or modification of the multi-year plans, L&I is prepared to partner with regions and the respective local board(s) in providing any necessary assistance or in hearing recommendations that may prove helpful to other regions and local areas. All questions, concerns or recommendations are welcome and may be submitted to the following resource account: RA-LI-BWDA-Policy@pa.gov

XIII. **Appendices and Templates.** This policy as well as fillable templates and other supporting documents required to be attached to the WIOA Local Plan are found at the L&I website <https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>, below the posting of this policy.

- Appendix A: Planning References and Resources
- Appendix B: Definitions
- Appendix C: WIOA Multi-Year Regional Plan Instructions
- Appendix D: WIOA Multi-Year Local Plan Instructions
- Epilogue: Public Comments and L&I Responses
- Online Templates and Supporting Documents:
 - Appendix C - WIOA Regional Plan template
 - Appendix D - WIOA Local Plan template
 - Appendix E - Local Workforce Development System Organizational Chart model
 - Appendix F - Local Area WIOA Title I Programs Performance Accountability template
 - Appendix G - Local Workforce Development System Program Partner-Provider List template
 - WIOA Plans Modification Form

Multi-Year Regional and Local Plans

Appendix A: Planning References and Resources

I. References. Each of the following references is hyperlinked for easy access:

- [Public Law \(Pub. L.\) 113-128, Workforce Innovation and Opportunity Act \(WIOA\)](#)
- [20 Code of Federal Regulations \(CFR\), WIOA Final Rules and Regulations](#)
- [29 CFR Part 97, Monitoring and Reporting Program Performance](#)
- [2 CFR Part 200 et al, and Part 2900, Office of Management and Budget \(OMB\) Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards](#)
- [U.S. Department of Labor Employment and Training Administration \(ETA\) Training and Employment Guidance Letter \(TEGL\) No. 37-14, Update on Complying with Nondiscrimination Requirements: Discrimination Based on Gender Identity, Gender Expression and Sex Stereotyping Are Prohibited Forms of Sex Discrimination in the Workforce Development System](#)
- [TEGL No. 13-16, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act \(WIOA\)](#)
- [U.S. Department of Labor Employment and Training Administration \(ETA\) Training and Employment Notice \(TEN\) No. 1-15, Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide](#)
- [Pennsylvania WIOA PY 2016 – PY 2019 Combined State Plan](#)
- [Pennsylvania Workforce System Directives](#)
- [Pennsylvania Management Directives](#)

II. Resources. Each of the following resources is hyperlinked for easy access:

- [Pennsylvania Workforce Development Board](#) (PA WDB) information
- [Center for Workforce Information and Analysis, or CWIA](#), presents a wide range of data and information on their website, and are available to provide technical assistance regarding planning questions that necessitate labor market and economic information analysis.
- [The Americans with Disabilities Act \(ADA\)](#)

Multi-Year Regional and Local Area Plans

Appendix B: Definitions

Commonwealth Workforce Development System, or CWDS, is the sole data-management and reporting system of record used for all data collection and reporting related to all WIOA Title-I and Title-III, Wagner-Peyser Act and Trade Act-related activity in Pennsylvania.

Core programs are the partner programs found in WIOA title I (Adult, Dislocated Worker and Youth); title II (Adult Education); title III (Wagner-Peyser); and title IV (Vocational Rehabilitation).

Individuals with a barrier to employment is a member of one (1) or more of the following populations:

- Displaced homemakers;
- Low-income individuals;
- Indians, Alaska Natives and Native Hawaiians, as such terms are defined in WIOA Sec. 166;
- Individuals with disabilities, including youth who are individuals with disabilities;
- Older individuals;
- Ex-offenders;
- Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 1403e-2(6), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))).
- Youth who are in or have aged out of the foster care system;
- Individual who are English language learners, individuals who have low levels of literacy and individuals facing substantial cultural barriers;
- Eligible migrant and season farmworkers, as defined in WIOA Sec. 167(i);
- Individuals within two (2) years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et. seq.);
- Single parents (including single pregnant women); and
- Long-term unemployed individuals.

Partnerships for Regional Economic Performance (PREP) the ten (10) regions created by DCED for the purpose of long-term strategic planning to invest in economic growth throughout the commonwealth.

Pennsylvania CareerLink®/PA CareerLink® is the registered, trademarked name of Pennsylvania's one-stop workforce development service-delivery system, including each one-stop center and all aspects of the online system used by partners, contractors, individuals, training providers and employers.

Pennsylvania Department of Labor & Industry, or L&I, is legally designated by the governor to serve as the state workforce agency.

Required and additional partners are the entities identified at WIOA Section 121(b)(1)(B) and (2)(B), as well as, 20 CFR §§ 679.400 and 405, that compose the designated area's one-stop delivery system. The required partners are the entities responsible for administering the required programs and activities in the local area. In addition to the required partners, other entities that carry out a workforce development program, including federal, state or local programs and programs in the private sector, may serve as additional partners in the one-stop delivery system if the local board and chief elected official(s) approve the entity's participation (see 20 CFR § 678.410).

Note: The entity that carries out the program and activities listed above, and therefore serves as the one-stop partner, is the grant recipient, administrative entity or organization responsible for administering the funds of the specified program in the local area. The term "entity" does not include the service providers that contract with, or are sub-recipients of, the local administrative entity. For programs that do not include local administrative entities, the responsible state agency must be the partner. Specific entities for particular programs can be found at 20 CFR § 678.415.

Appendix C: Multi-Year Regional Plan Instructions

WIOA requires a broad strategic approach to planning focused on the overarching vision, goals, alignment and shared responsibilities within a designated region. Pennsylvania implemented the requirements of WIOA by employing a two-tiered approach to meeting this requirement by allowing a 1-year WIOA transitional plan followed by a more comprehensive multi-year plan. This approach provided latitude for regions that were not yet be able to fully address all the outlined questions required in a four-year regional plan. Designated regions are required to provide a regional plan that incorporates each of the questions listed unless noted otherwise.

For most of the questions listed in these instructions, L&I has included a sub-section labeled, “*Expectation*”. This section provides planners with some practical concepts for developing a narrative to the associated question, and may include various questions aimed at creating a basis for discussion. Such concepts are not all inclusive, but serve to provide a foundation for building each narrative. L&I will use the general contextual meaning of the specific question as well as the *expectation* for each question to evaluate the respective narrative when reviewing each plan submitted for a region.

Note 1: The regional plan should be broader in scope than the plan developed for the respective local area(s) within the region. The regional plan drafters are encouraged to include data samples and streamlined graphics and tables instead of large volumes of data, tables and graphs wherever and whenever such information is included in the plan.

Note 2: The local board must cite the source(s) that are used to collect all or part of the regional labor market data (e.g., Center for Information and Analysis (CWIA)).

1.1. Identification of the region.

Provide the following:

- A reference name for the region;
- Identification of the LWDA(s) that comprise the region;
- Identification of the key region committee members charged with drafting the regional plan to include organizational affiliation; and
- A list of key region committee meeting dates.

1.2. Describe the collection and analysis of regional labor market data (in conjunction with the Commonwealth). [WIOA Sec. 106(c)(1)(D); 20 CFR 679.510(a)(1)(iv); 20 CFR 679.560(a)(1)(i) and (ii)]

Expectation: Regional planner(s) should describe and analyze regional labor market data so as to articulate the region’s economic conditions and employment needs of employers. If the region is identified as a “Planning Region”, additional narrative could be included that describes the similarities and differences of associated local areas with regard to the economic conditions and competitive strengths and weaknesses of business market factors found in each local area.

The narrative should include:

- Describe the state of the regional economy and key positive and negative economic conditions (e.g., on-going business cycle impact, business community vitality, unemployment trends; demographic information; key legal-political-social conditions; technological changes; natural forces; etc.);
- Identify key industry cluster(s);
- Identify existing and emerging in-demand industry sector(s);
- Identify existing and emerging in-demand industry sector(s) occupations;
- Provide data describing the location quotients (LQ) of the region and local area(s); and
- Describe the employment needs of employers in existing and emerging in-demand industry sectors and occupations.

1.3. Based on the analysis of the regional labor market and economic conditions, describe the region’s workforce and economic development-oriented vision and goals. [WIOA Sec. 106(c)(1)(D); 20 CFR 679.510(a)(1)(vii)]

Expectation: The narrative should include a description of the region’s vision and a set of goals that are cognizant of the regional economic conditions labor market data, and are in alignment with the state plan. Narrative should include, but is not limited to:

- How the strategic goals consider both workforce and economic development priorities within the region;
- **(Added) How the local board will work with local economic development organizations to achieve strategic goals;** and
- How the coordination of services with regional economic development services and providers will occur.

Appendix C: Multi-Year Regional Plan Instructions

1.4. Describe the regional service strategies aimed at achieving the vision and goals established for the region. [WIOA Sec. 106(c)(1)(B); 20 CFR 679.510(a)(1)(ii)]

Expectation: This narrative should include, but is not limited to a description of:

- Broad-based, overarching sector and industry strategies;
- Coordination of services with regional economic development services and providers in the region; and
- Any cooperative service delivery agreements that have been established for the region.

The following expectations are for regions designated as 'Planning Regions' only. If applicable, describe:

- How will regional business service strategies be employed, as well as, how coordination of these strategies will impact the operational level of services (i.e. local area business service teams (BST));
- How the region will connect targeted populations, especially youth and individuals with barriers to employment, to career services and training activities offered on a regional level such YouthBuild, Job Corps and AmeriCorps sites; and
- How the region will coordinate with secondary and post-secondary institutions (including programs authorized by the Carl D. Perkins Act) to align strategies, enhance services and avoid duplication of services (include `specific reference to adult education, community colleges and CECs).

1.5. Describe the development and implementation of sector initiatives for in-demand industry sectors or occupations for the region. [WIOA Sec. 106(c)(1)(C); 20 CFR 679.510(a)(1)(iii)]

Expectation: The narrative response should capture any sector or industry initiatives, partnerships, next-generation sector partnerships and any other sector-based initiatives that support all or part of the region (including economic development partners). This narrative should include, but is not limited to:

- The identity and a description of key sector or industry initiatives, partnerships, next-generation sector partnerships and any other sector-based initiatives that support all or part of the region;
- An explanation regarding why the region has targeted select sectors, partnerships and other initiatives; and
- A description of, and reasoning for, the current in-demand occupation(s) that are expected to change status as well as occupations that may change to become an in-demand occupation.

1.6. Describe how the region will connect employer labor force requirements and occupational demands with the region's labor force, including individuals with barriers to employment.

Expectation:

- Regional plans must incorporate strategies that reflect local leaders and boards considering how to optimize the available opportunities and minimize the structural weakness presented by the current workforce system environment for the betterment of regional employers and the labor force;
- Narrative may include how the region will connect targeted populations, especially youth and individuals with barriers to employment, to in-demand occupations;
- Narrative may include descriptions of when leaders, board members and stakeholders met and any subjects or resolutions that came to fruition; and
- Narrative may include summaries of any number of reports commissioned to research and determine recommended actions that are of concern to the local and regional workforce system leaders and stakeholders; examples include studies that indicate strategies and tactics that will increase the ability of employers to attract, hire and maintain regional labor force participants in gainful employment or evaluations of best practices for serving the various classes of individuals with barriers to employment.
- **Note:** While it is important that the drafters understand the data, and connect the labor force requirements and occupational demands, it is also important to connect with actual employers who will verify that need.

1.7. Describe the coordination of transportation and other supportive services for the region. [WIOA Sec. 106(c)(1)(F); 20 CFR 679.510(a)(1)(vi)]

Expectation: The region should describe the role transportation plays in the relationship of the labor force and employment opportunities, display the commuting data such as inflow and outflow and other patterns, articulate available transportation modes' strengths and weaknesses, and indicate how the region can help bridge the transportation gap between labor force and employment locations. Describe transportation availability for workforce members who are unable to benefit from personal transportation.

Additionally, the region should describe any regional and inter-governmental agreements that allows the coordination of identified regionwide supportive services and resources in such a manner as to permit customers to participate.

Appendix C: Multi-Year Regional Plan Instructions

1.8. (Planning Regions Only) Describe how the region established administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region. [WIOA Sec. 106(c)(1)(E); 20 CFR 679.510(a)(1)(v).

Expectation: This narrative should provide a description of the regional activities (e.g., regional planning), how such activities were determined and what funds will be used to pay for those activities. The narrative should also include the entity that will serve as the fiscal agent. Finally, the description should include how such regional cost arrangements will be handled for the region, including administrative costs, as appropriate.

1.9. (Planning Regions Only) Describe the agreement between the local boards that describes how the planning region will collectively negotiate and reach agreement with L&I on local levels of performance for, and report on, the performance accountability measures described in section 116(c), for each of the local areas within the planning region. [WIOA Sec. 106(c)(1)(H); 20 CFR 679.510(a)(1)(viii)]

Expectation: WIOA sec. 107(d)(9) requires that locals negotiate performance and 20 CFR § 679.510(a)(1)(viii) requires an agreement between local boards and chief elected officials for how a *planning region* will collectively negotiate and reach agreement with the governor on local levels of performance for, and report on, the performance accountability measures as required by WIOA sec. 116(c)(1)(H) and §679.510(a)(1)(viii). The representatives of each local area in a *planning region* are collectively responsible for the process. The narrative in the local plan should provide a description similar to the agreement reached between the local boards and chief elected officials. The answer could simply be that each local area will negotiate individually with the state.

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The local area plan serves as a four-year action plan to develop, align and integrate service delivery strategies to support Pennsylvania's vision, strategic and operational goals within LWDAs; as well as the regional goals and strategies (as appropriate). For purposes of WIOA transition, this particular local area plan encompasses four years as it supersedes the WIOA Transitional Plan PY16, which encompassed only one year.

The local area plan sets forth the strategy to:

- Direct investments in educational and training programs to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers;
- Apply demand-driven strategies in the one-stop delivery system;
- Enable economic, education and workforce partners to build a skilled workforce through innovation in, and alignment of, employment, training and education programs; and

These requirements set the foundation for WIOA principles, by fostering strategic alignment, improving service integration and ensuring that the public workforce system is industry-relevant, responding to the economic needs of the local area and matching skilled workers with employers.

Designated local areas are required to provide a local area plan that incorporates each of the questions listed in this local area plan appendix. **Note:** In the case of *single local area regions* where there may be a duplication of narrative between the regional plan and the local area plan there will be specific notes indicating the proper action to follow.

For most of the questions, L&I has included a sub-section labeled, "*Expectation*". This section provides planners with some practical concepts for developing a narrative to the associated question, and may include various queries aimed at creating a basis for discussion. Such concepts are not all inclusive, but serve to provide a basis for building each narrative. L&I will use the general contextual meaning of the specific question as well as the *expectation* for each question to evaluate the respective narrative when reviewing each plan.

Local Area Plan Contents:

Strategic Planning Questions

Section 1: Local Area Workforce and Economic Analysis

Section 2: Vision and Goals

Operational Planning Questions

Section 3: Local Workforce Development System and Investment Strategies

Section 4: Local Workforce Delivery System

Compliance

Section 5: Compliance Questions and Attestations

Appendix D: Multi-Year Local Plan Instructions

1. STRATEGIC PLANNING QUESTIONS: Local Area Workforce and Economic Analysis

Questions in this section are designed to address aspects of the local area's labor force such as its composition, and the determination of skill gaps between the talent needed by employers in the region and the knowledge and skills held by workers and job seekers. One question addresses the workforce development activities available within the region that are necessary to bridge the skill gaps that have been identified.

Local boards may provide a comparative analysis that describes similarities and differences between any of the regional plan narrative and what is (or may be) occurring in the local area.

Note 1: It is recommended that these plans include data samples and streamlined graphics and tables that support any narrative provided instead of large volumes of data, tables and graphs.

Note 2: The local board must cite the source(s) that are used to collect all or part of the regional labor market data (e.g., Center for Information and Analysis (CWIA)).

1.1. Identify the composition of the local area's population and labor force. [20 CFR § 679.510(a)(3)]

Expectation: Narrative should focus on characteristics about the region's population such as age distribution, educational attainment levels, individuals with barriers to employment (based upon WIOA Sec 3.24) and employment status. This section should also focus on trends in each of these areas. Explain why some of these groups are harder or easier to serve. Data should be provided to support narrative as appropriate.

1.2. How are skills gaps defined in the local area? Provide a description of the skills that are required to meet the needs of employers in region and local area? [20 CFR 679.560(a)(2)]

Expectation: The narrative response is not expected to be data-heavy and should focus more on policy, best practices and knowledge of workforce. The narrative response should explain how the local area identifies skills gaps that exist between the needs of regional employers and the qualifications of the existing local area workforce. The narrative response should highlight specific local examples of these gaps such as a workforce with insufficient and outdated skills, a workforce with skills that exceed job demand, a lack of training programs for needed skills and other factors unique to your local area.

The local area may support the narrative by:

- Focusing on the specific talent (knowledge and skills) believed to be needed by employers in the local area region;
- Speaking to employability skills, as well as hard skills—especially when considering the focus on serving individuals with a barrier (or multiple barriers) to employment; and
- Identifying the certifications, degrees or fields of study most in-demand in the local area.

1.3. What are the challenges the local area faces in aligning existing labor force skills and education and training activities with the needs of regional employers?

Expectation: Local area plans must incorporate strategies that reflect local leaders and boards considering how to optimize the available opportunities and minimize the structural weakness presented by the current workforce system environment for the betterment of regional employers and the labor force. The narrative response may include descriptions of when leaders, board members and stakeholders met and any subjects or resolutions that came to fruition. Narrative can include summaries of any number of reports commissioned to research and determine recommended actions that are of concern to the local area and regional workforce system leaders and stakeholders; examples include studies that indicate strategies and tactics that will increase the ability of employers to attract, hire and maintain regional and local area labor force participants in gainful employment, or evaluations of best practices for serving the various classes of individuals with barriers to employment.

Narrative should also include incumbent worker training and how the local workforce delivery system will work with regional employers to fill the entry-level positions created by the upskilling of incumbent workers.

Note: While it is important that the drafters understand the data, and connect the labor force requirements and occupational demands, it is also important to connect with actual employers who will verify that need.

1.4. Provide an analysis of local area workforce development activities, including education and training. [679.560(a)(4)]

Expectation: Narrative must present an analysis that includes the strengths and weaknesses of workforce development activities, including education and training activities and the capacity of the workforce system to provide the activities necessary to address the education and skill needs of the workforce, including individuals with barriers to employment and the employment needs of employers.

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2. STRATEGIC PLANNING QUESTIONS: Vision and Goals

Considering the local area analysis developed in Section 1, *Local Area Workforce and Economic Analysis*, as well as the goals established by the governor as outlined in the state plan, as well as the goals established regionally, each local area plan will provide a narrative for each of the questions outlined in this section. Such responses will identify the strategic vision and goals of the local area as created by the chief elected officials, the local board and the local workforce system stakeholders.

It is important to note that where a local board is part of a planning region, such responses will identify the strategic vision and goals of the local area in support of the planning region.

2.1. What are the local board's strategic vision and goals for preparing its workforce? [WIOA Sec. 108(b)(1)(E); 20 CFR § 679.560(a)(5)]

Expectation: The narrative should include, but is not limited to:

- Local board's strategic vision;
- Local areas associated with "Planning Regions" must also consider their respective regional plan goals and strategies, list appropriate goals and strategies to maintain alignment;
- Local areas identified as a "Single Local Area Region" may indicate where to locate the answer in the regional plan or may duplicate the answer; and
- Identify any additional local board goals and strategies.

Note: The local board will need to complete the 'Goals and Strategies matrix' fillable template found online at the L&I website.

2.2. What is the local board's strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals for the local area? [WIOA Sec. 108(b)(1)(F); 20 CFR § 679.560(a)(6)]

Expectation: Considering the local board's responses to the questions at Section 1, *Regional Workforce and Economic Analysis*, the narrative will describe the *strategy* developed by the local board to carry out the core programs and the programs of the required and additional partners. How will this strategy assist in aligning all of the resources available to achieve the strategic vision and goals of the local area.

2.3. How will the local board's vision and goals align with, support and contribute to the governor's vision and goals for the State's workforce development system, as well as the goals and strategies articulated in the regional plan? [WIOA Sec. 108(b)(2); 20 CFR § 679.560(b)(1)(ii)]

Expectation: Narrative should indicate that the local board has adopted the governor's vision and all of the goals as articulated in the WIOA combined state plan; it is expected that local board's goals and strategies are reasonably aligned with the WIOA combined state plan, as well as any appropriate regional plan goals and strategies (*wherever the local area is part of a planning region*).

The narrative should take into consideration the following points:

- How the local area will connect adults, dislocated workers and other targeted populations, especially youth and individuals with barriers to employment, to in-demand occupations;
- How the skill gaps (addressed in the narrative to question 1.2 above) will be eliminated or narrowed;
- How the local board will target services efficiently to educate and increase the knowledge and skill sets of its workforce;
- How the local board will develop and implement a comprehensive Career Pathways plan (including both employment and education components, as well as adult education) throughout the local area;
- How the local area will coordinate with secondary and post-secondary institutions (including programs authorized by the Carl D. Perkins Act) to align strategies, enhance services and avoid duplication of services (include `specific reference to adult education, community colleges and CECs);
- How the system will improve access to services and to activities that lead to a recognized postsecondary credential;
- How the local area will expand upon work-based training goals and strategies such as transitional jobs;
- How will local area business service strategies be employed (i.e. business service teams (BST)); and
- Describe how the goals will support economic growth, and economic self-sufficiency for the local area.

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2.4. What are the local levels of performance that have been negotiated with the governor and chief elected officials? [WIOA 116(c); 20 CFR § 679.560(b)(16)]

How will the local board's goals relate to the achievement of these measures? [WIOA Sec. 108(b)(17); 20 CFR § 679.560(b)(5)]

Expectation #1: Local plans must complete the WIOA Title I performance measures table found within the fillable template (Appendix C, *Multi-Year Local Plan Instructions*); the table incorporates the local levels of WIOA negotiated performance goals and the previous year attained performance measures.

Expectation #2: Narrative must describe how the local board's goals will assist in achieving the negotiated performance levels, and to what extent the local board's goals are impacted by such levels. Narrative should address how such levels of performance are used to measure the performance of the local area.

3. OPERATIONAL PLANNING QUESTIONS: Local Area Workforce System and Investment Strategies

The responses to the following questions will expand on the visions and goals of the previous section, which will include how the local board designs strategies to reach those goals. Where a local board is part of a planning region, such responses will identify the strategic vision and goals of the local area in support of the planning region.

3.1. Provide a descriptive overview of the governance structure for the workforce system, including key stakeholders and entities in the local area.

Expectation: Narrative should include a description of how local elected officials, advocacy groups, the LWDB and other key stakeholders interact within the local workforce system. This description should include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce system:

Governance and Administrative functions

- The local elected officials in the governance of the local workforce system (i.e., local board), as well as the day to day operations of the local workforce delivery system;
- The identity and role of the entity responsible for the disbursement of grant funds (i.e., fiscal agent entity) as determined by the chief elected official(s);
- The role of the LWDB as the governing body responsible for the governance, strategic planning, fiscal and oversight of the local workforce system;
- Include a listing of each committee of the board (executive committee, if applicable, and each standing committee (required and ad hoc). Provide a brief description of the function of each committee;
- The identity and role of the entity responsible for providing staff to the local board (i.e., administrative entity); and
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections.

Each local board is expected to include an organization chart that depicts a clear separation of duties between the local board and programmatic and service delivery entities. *(A sample organization chart has been provided at Appendix E of this policy. Additionally, a Microsoft Word version of the chart is available on the website.)*

Structure Exceptions: Consistent with Workforce System Policy (WSP) No. 02-2015, *Local Governance Policy*, Dec. 18, 2015, Section VI.F., *Restrictions*, in cases where career and training services are provided by an interrelated agency (i.e., county agency, commission structure or corporation) that is also the employer of the LWDB staff and fiscal agent staff, the service and training provider staff must report to a supervisor that does not oversee local board or fiscal agent staff. L&I has determined that any one of the interrelated agencies listed above must have separate departments to ensure a clear separation between governance and the day-to-day operations, and that each department head must report to a different local elected official.

The chief elected official(s), in collaboration with the local board, must address any structural issues in this section of the local plan. The narrative must articulate that when career and training services are provided by an interrelated agency that is also the employer of the local board staff and fiscal agent staff, that separate departments, internal controls and appropriate supervision for each department is in place.

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3.2. What are the programs included in the local workforce delivery system and how will the local board work with the entities carrying out all workforce programs to support service alignment? [20 CFR § 679.560(b)(1)]

Expectation:

- L&I has provided a ‘One-Stop location and Program Services’ template to be included as an attachment that will identify the programs, the provider(s) of such programs and where in the local area the programs can be accessed;
- Please provide a description of each of the local area workforce system required and additional partner programs (by completing the provided ‘One-Stop location and Program Services’ template);
- Narrative should describe how the local board will collaborate with each of the required and additional partners in the PA CareerLink® service delivery system, to promote service alignment; and
- How will alignment of such programs support the strategy identified in the state plan, the regional plan and the local area’s strategies?

3.3. How will the local board work with the entities carrying out core programs to: [20 CFR § 679.560(b)(2)]

- Expand access to employment, training, education and supportive services for eligible individuals, particularly individuals with barriers to employment.
- Facilitate the development of Career Pathways and co-enrollment, as appropriate, in core programs (specify on-ramps from adult education).

Expectation: The narrative should:

- Describe the local board’s methods of validating the eligibility of individuals, including the use of telephone verification and documentation inspection verification, especially in consideration of individuals with barriers to employment;
- Outline the steps staff will take to verify eligibility prior to self-certification;
- Describe strategies and operational elements established to ensure that participant “co-enrollment” across relevant programs is practiced;
- Describe strategies and operational elements established to increase awareness and access to WIOA title II programs;
- Describe strategies and operational elements established to increase awareness and access to the WIOA title IV programs, and that operational compliance concerns are addressed (e.g. qualified OVR counselors determine eligibility for services);
- Describe efforts to identify and improve access to activities leading to a recognized postsecondary credential; and
- Describe operational elements the local board has developed to address the systemic process created to develop and promote Career Pathways.

3.4. What strategies will be implemented in the local area to improve business and employer engagement that: [20 CFR § 679.560(b)(3)]

- Support a local area workforce development system that meets the needs of businesses in the local area;
- Manage activities or services that will be implemented to improve business engagement;
- Better coordinate regional workforce and economic development strategy, messaging, engagement and programs; and
- Strengthen linkages between the PA CareerLink® service delivery system and unemployment insurance (UI) programs.

Expectation: The narrative should:

- Describe the local board’s strategies and key operational elements that frame the following initiatives:
 - Work-based training opportunities, including but not limited to: incumbent worker training programs, on-the-job training programs, customized training programs;
 - industry and sector strategies;
 - career lattices and pathways initiatives (including how they are connected to adult education);
 - apprenticeship models;
 - utilization of effective business intermediaries; and
 - other business services and strategies designed to meet the needs of regional employers.
- Describe who facilitates the engagement of employers in workforce development programs, including small employers and employers operating within in-demand industry sectors and occupations;
- Indicate how the local board will engage employers within in-demand industries and ensure that the employment and training activities in the local area meet the needs of its employers;
- Describe entity(s) tasked with the management and administrative roles of the business engagement services function (which includes employer case management, tracking of services and data research and analysis) as well as tracking which entities are making employer visits and the collaboration that occurs during these visits;

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- Describe the roles and responsibilities of local board staff hired and contracted entities primarily tasked with business engagement related activities and services;
- Indicate how the local board continues to develop appropriate ways to measure and benchmark employer outcome results;
- Describe how the local board will improve key economic development partner relationships;
- Provide insight into how programs and services are being adopted by businesses and employers;
- If the local area has Industry Partnerships, address how the partnership employers influence not only the industry partnership training, but also that of the entire area;
- **(Added) Describe how the local board can improve strategies and practices to increase business and employer engagement over current levels;**
- Describe how the local board can better coordinate regional workforce and economic development strategy; and
- With the knowledge that Unemployment Compensation (UC) representatives are not available to be deployed in the PA CareerLink® sites and only UC courtesy phones are provided, describe the local board’s strategies and operational elements it utilizes to support unemployment insurance programs and resources employed for the benefit of local area businesses and citizens:
 - Describe how UC claimants are provided reemployment services, including a brief overview of how the local board manages the “Profile Reemployment Program” (PREP) or the “Reemployment Services and Eligibility Assessment” (RESEA) program;
 - Describe how the local board supports UC claimants, indicating they are complying with Pennsylvania’s UC law “Register for Work and Work Search”; and
 - Indicate how the local board identifies and refers to UC for adjudication, listing any potential UC eligibility issues identified during PREP, RESEA or any other UC claimant interaction.

Note: The narrative may contain other strategies the local board employs to expand employment and career advancement opportunities for workforce development system participants within in-demand industries or sectors.

3.5. How will the local board coordinate local area workforce investment activities with regional economic development activities that are specific to a local area? How will the local board promote entrepreneurial skills training and microenterprise services? [20 CFR § 679.560(b)(4)]

Note: Alignment between the public workforce system and local economic development activities (e.g. Engage!, PREP, etc.) is critical in order to identify and fulfill industry talent needs by training customers for emerging and in-demand job skills. Furthermore, microenterprise development refers to training for the purposes of self-employment. This training strategy may be appropriate for individuals or participants with barriers to employment, including persons with disabilities. *WIOA Final Rules, Preamble pg. 56108, first column.*

Expectation: The narrative should:

- Describe how the local board will strategically coordinate with regional economic development and employer partners in the local area to identify and fulfill industry needs;
- Describe regional and local area DCED supported activities, e.g. Small Business Development Centers (SBDC) {note that SBDCs are PREP agencies} that collaborate with interested entities;
- **(Added) Describe the resources the local board will use to promote entrepreneurial skills training and microenterprise services;**
- Include a description of how the local board is measuring employer outcome results; and
- Describe how the local board will support and promote a training strategy that leads to self-employment. How might this strategy be used to help individuals or participants with barriers to employment (e.g., persons with disabilities and ex-offenders).

4. OPERATIONAL PLANNING QUESTIONS: Local Area Workforce Delivery System

The questions in this section require greater detail and should focus on how the local board will execute the strategies in section 3. The responses in this section should be more explicit in that they will expand on the roles of all partners, include examples of specific employment and training activities, as well as specific methods used to engage employers.

4.1. Provide a descriptive overview of the local area workforce delivery system, including key stakeholders and entities in the local area.

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Expectation: Narrative should include a description of how local elected officials, advocacy groups, the local area workforce development board, required and additional partners and other key stakeholders interact within the local area workforce service delivery system. This description should include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce *service delivery* system:

Programmatic functions

- The identity and key role(s) of the PA CareerLink® operator(s) in the local area. Include a summary of the competitive process used (or will be used) to procure such entity;
- The entity or entities identified to provide WIOA title I programs and activities in the local area. Include a summary of the competitive process used (or will be used) to award the subgrants and contracts;
- The entity or entities that provide WIOA title II, Adult Education and Literacy programs and activities in the local area;
- The entity or entities that provide WIOA title III, Wagner Peyser programs and activities in the local area;
- The entity or entities that provide WIOA title IV, Vocational Rehabilitation programs and activities in the local area;
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections;
- Advocacy groups in the local area; and
- Other key stakeholders that compose the local area workforce delivery system network.

4.2. Identify the one-stop partners (required and other) authorized to provide required and other programs within the local area. Describe briefly the role(s) of the one-stop partners (required and other). [20 CFR § 679.560(b)(5)(iv)]

Expectation: Narrative should list each of the one-stop partners, as well as describe their roles and the resource contributions to the local area workforce delivery system. Examples of resource contributions may include, but are not limited to, in-kind and programmatic contributions.

Local boards are required to complete and attach the ‘One-Stop Location and Program Services’ template that can be found on the L&I website. This information found in the completed template identifies comprehensive and affiliate PA CareerLink® sites, as well as specialized centers, and the programs available at each.

4.3. How will the local board facilitate access to services provided through the one-stop service delivery system? [20 CFR § 679.560(b)(5)(ii)]

Expectation: The narrative should explain how the local board plans to facilitate access to services provided through the one-stop service delivery system, with evidence of efforts to expand access regarding the provision of employment, training, education and supportive services for eligible individuals, particularly concerning individuals with barriers. Consideration should be given to ways that technology, transportation and information sharing help expedite service access to customer, especially to remote and rural areas, target populations and individuals with disabilities. Available training programs and outreach activities should be described regarding services that partner agencies provide, and how to access such services.

The narrative should describe specifically how the local board facilitates service access with a consideration of the following:

- Plans to leverage resources and expand capacity within the local area workforce delivery system;
- Facilitating access to services provided through the one-stop delivery system (including facilitating access in remote areas);
- A description of efforts to provide quality services to remote and rural areas through the use of technology and other means;
- In conjunction with a WIOA participant’s interaction with the one stop delivery system, and program case managers in particular, describe how and when participant or employer information is entered into the state’s system of record (i.e. CWDS). If a program case manager does not enter some or all the participant and employer information, describe who enters the information. Describe when the participant or employer information is entered into the state’s system of record (i.e. CWDS) in relation to the time services were actually performed;
- Describe other state-owned case management information system(s) employed in the local area that WIOA participants’ information is entered and stored (e.g. Unemployment Insurance, Adult Education, OVR, etc.). The local area must indicate the program partner that is the responsible entity that uses the case management information system;
- The local board must provide a description of the process that identifies participants not provided with WIOA title I and Title III career and training services but are enrolled in other WIOA programs. Describe how and when these WIOA participants’ services and activities are entered into the CWDS;
- List non-Commonwealth owned and leased information management system(s) employed in the local area to aid in the management of WIOA programs (include information management system(s) used by contracted service providers). If such system(s) is used, describe the process the local area uses to align the WIOA participant information entered into the local area’s additional non-Commonwealth owned and leased case management information system(s) with CWDS. The local

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board must provide a rationalization for why this data alignment process with CWDS is an optimum utilization of time, effort and funds;

- Participate in the development of Career Pathways that provide access to employment and training for individuals in adult education programs;
- Utilize partners' program information sharing in ways that stress the importance of getting the information to customers quickly, as well as ensuring that communication is accessible;
- Identify strategies for better meeting the needs of individuals with barriers to employment (such as improving digital literacy skills); and
- How the local board 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.

Note: Off-site program partner service locations may provide access to career services.

4.4. How will entities within the one-stop service delivery system, including one-stop operators and the one-stop partners, comply with WIOA Sec. 188 (as applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101, et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities? [20 CFR § 679.560(b)(5)(iii)]

Expectation: The narrative should indicate how compliance with WIOA section 188, including the civil rights and equal opportunities, and applicable provisions of the Americans with Disabilities Act of 1990 will be assured for those that avail themselves to the services and resources (and that resources are at an appropriate reading level for the general population) of the local area one-stop delivery system (including regional designated services locations and 'mobile' one-stops). L&I recommends the narrative include the following topics:

- List key technology and materials available for individuals with disabilities to use at the one-stop;
- Describe operational support for addressing the needs of individuals with disabilities;
- Describe the efforts to address the needs of Individuals with limited English proficiency (LEP);
- If applicable, describe program partner(s), as well as other stakeholder(s) actions related to the subject matter of this question;
- Describe local area staff trainings related to the subject matter (e.g. civil rights, equal opportunity, LEP, physical and programmatic accessibility, disability etiquette and sensitivity training) presented in this section and indicate when the trainings occurred;
- List the One-Stop program partners participating in local staff training indicative of the subject matter this section; and
- Describe L&I's Office of Equal Opportunity annual compliance reviews and any technical assistance provided.

4.5. Describe how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local area employers, workers and job seekers. [20 CFR § 679.560(b)(5)(i)]

Expectation: Narrative should describe how the local board determines the variety, quantity and quality of workforce services (i.e. employment, education and training activities), the service providers and the activities that support this endeavor.

The narrative should take into consideration the following points:

- Explain the local board's periodic process that may employ regional and local area labor market information, High Priority Occupation list, as well as stakeholder input to help inform and meet workforce activity goals and objectives;
- Describe how the board projects the needs of employers, workers and jobseekers, including consideration of pipeline needs;
- Describe the local board's outreach plan designed to better understand employers and their needs as well as service providers (e.g., employment, training and education);
- Describe how the local board will ensure sufficient numbers of quality eligible providers that meet the needs of employers and individuals;
- Briefly explain how the local board employs the procurement process cycle to support continuous improvement;
- Describe the local board's oversight roles assigned to the board and how it is implemented throughout the workforce service delivery system to support continuous improvement;
- Describe the local board's assessment and monitoring process of the service providers; include the review of training provider's performance data as well as qualitative information;
- Describe the local board's review, tabulation and consideration of customer satisfaction surveys; and
- Describe the local board's application of L&I's Eligible Training Provider policy.

4.6. Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [20 CFR § 679.560(b)(6)]

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Expectation: Narrative should describe all WIOA title I adult (A) and dislocated worker (DW) employment and training activities in the local area, including those involving basic literacy skills, and how these activities are assessed. Additionally, the narrative must reflect how the local board selects and determines the availability of A and DW activities for the benefit of participants, including individuals with barriers to employment.

The narrative should take into consideration the following points:

- Describe how the local board identifies and then determines the types of A and DW employment and training activities that will be needed in the future;
- Identify the local board's key assessment criteria and processes used to select A and DW employment and training activities (include key procurement steps that lead toward a complete assessment of the activities);
- Explain the local board's consideration of future revisions and adoption of A and DW activity assessment criteria and processes;
- Articulate the board's effort to attract a greater quantity of title I A and DW training providers including online providers;
- Identify key employment and training activity discrepancies (if any) and solutions the board is considering and planning to implement;
- Explain how the local board determines the quantity and quality of available A and DW employment and training activities;
- Explain the local board's WIOA title I Priority of Service policy in brief terms {do not attach the policy}. Explain how the board is continuing to review local area labor force data to support local area discretionary priority groups;
- Articulate the new emphasis WIOA has placed on the need to provide services to older youth and how the local board has responded to this requirement;
- If used, explain the process implemented to transfer program funds between A and DW programs (as needed) to help ensure sufficient training opportunities for eligible participants; and
- Describe the board's operational position and current actions relative to the development and promotion of Career Pathways, co-enrollment of participants across multiple WIOA programs, and work-based training activities such as transitional jobs.

4.7. How will training services be provided through the use of individual training accounts (ITA) that fund programs of study, or through the use of contracts for training services that fund work-based trainings. [20 CFR 679.560(b)(18)]

Expectation: Narrative should include how ITAs and contracts, as outlined in WIOA Sec. 134, will be used in a coordinated manner to provide such services in the local area. In particular, the narrative should:

- Describe the ITA cap for the local area, as well as the methodology used by the local board to determine the cap;
- Describe how the local board will determine the circumstances in which contracts will be used instead of ITAs; and
- Describe how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

4.8. Provide a description and assessment of the type and availability of youth workforce investment activities in the local area. [20 CFR § 679.560(b)(8)]

Expectation: Narrative should describe established priorities of the local board that allow for the service of as many eligible youths as possible, especially out-of-school youth (OSY), older youth and those young people who are most at risk of not acquiring the necessary skills and abilities to attain meaningful employment, including individuals with a disability. Successful models of activities should be included.

Narrative should describe the make-up of the local board's Youth Standing Committee and its role in youth program design, including making the 14 Program Elements available to participants, prioritizing recruitment and services to OSY (WIOA 75 percent expenditure requirement), increasing work experience opportunities for youth (WIOA 20 percent expenditure requirement), developing strong Career Pathways, increasing the co-enrollment of youth into partner programming in alignment with the participant's individual service strategy and goals, and leveraging TANF Youth Development funding (YDF) to offer workforce activities to even more local area youth.

Local boards must also outline and define WIOA youth eligibility documentation requirements, including the "requires additional assistance to complete an education program or to secure and hold employment" criteria.

Narrative should include a description of WIOA title IV Pre-Employment Transition Services provided to potentially eligible and eligible in-school youth with disabilities.

Narrative must include local board strategies and collaborative actions with stakeholders to support YouthBuild, Job Corps and AmeriCorps sites (if applicable).

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Additionally, if the local area is designated as part of a 'Planning Region' the local board, in concert with the other local boards comprising the 'Planning Region', may articulate regional level strategies and activities within the regional plan (see Appendix C - Multi-Year Regional Plan Instructions, question 1.4).

NOTE: Categories of 'additional assistance' are required to be defined and developed for both ISY and OSY. However, the 5 percent limitation for the use of this 'additional assistance' barrier category only applies to ISY. [WIOA (Department of Labor Only) Final Rule sections 681.300 and 681.310].

4.9. How will the local board coordinate workforce investment activities and ensure they are carried out in the local area with statewide rapid response? [20 CFR § 679.560(b)(7)]

Expectation: Narrative should describe the strategy and role of the local area and regional (if applicable) business service teams with the Rapid Response services. In addition, describe how the board is using the Rapid Response Guidance and Rapid Response and Trade Guidance released early 2017 to guide partners when providing rapid response services.

Note: Local boards should consider libraries as a possible place for Rapid Response teams to assemble, given their Wi-Fi, technology, role in communities, etc.

4.10. How will the local board coordinate relevant secondary and postsecondary education programs and activities with workforce investment activities to support strategies, enhance services and avoid duplication of service(s). [20 CFR § 679.560(b)(9)]

Expectation: Narrative should describe:

- Local board strategies to coordinate and enhance workforce services regarding secondary and post-secondary education. The description needs to include methods involved to avoid duplication of services;
- Accessibility improvement of post-secondary programs and expanding access to appropriate technology in career and technical education programs, especially to online training programs that can help to eliminate skill gaps;
- **(Added) Local board actions related to Perkins Act Section 134 biennial "CTE comprehensive needs assessment";**
- Relevant education programs that include adult education, community colleges, CECs, private licensed schools; and
- Basic skills training.

4.11. Describe the plans, assurances and strategies for maximizing coordination, improving service delivery and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the one-stop service delivery system. [20 CFR § 679.560(b)(11)]

Expectation: The narrative should describe strategies that will implement operational goals of the one-stop system and how these strategies will maximize coordination among one-stop system partners. It must specifically describe how the required partners' activities and services are improved and duplication is avoided, as well as how merit staff and contracted service providers are coordinated. Additionally, the narrative should contain information surrounding the roles of the operator and site administrator(s) in coordinating local area program providers' efforts and improvement of services.

The narrative describing these efforts should include, but is not limited to a description of:

- How the roles and responsibilities among partner programs are coordinated to achieve optimum results and avoid duplication of services;
- The efforts that are or will be implemented to improve program partner integration at PA CareerLink® centers;
- The one-stop delivery system's referral mechanism;
- The established minimum requirements for a PA CareerLink® career services orientation, the method used for directing basic career services customer flow, use of a customizable initial intake form and a customizable template for developing Individual Employment Plans to ensure consistency and support alignment of services across programs, thus reducing duplicate data among partners; and
- The program partner's staff development efforts designed to strengthen the professional skills of co-located partners' staff in PA CareerLink® centers, such as cross-program staff training. As a partner, adult education could participate in delivering training in professional skills.

4.12. How will the local board coordinate WIOA title I workforce investment activities with adult education literacy activities under WIOA title II? [20 CFR § 679.560(b)(12)]

Expectation:

- Indicate if WIOA title II adult education providers were involved in the development of the local area plan and the providers' involvement with the topics presented in Appendix D, question 4.11;
- Describe how the local board will carry out the review of applications to provide adult education and literacy activities under WIOA title II for the local area to determine whether such WIOA title II applications are consistent with the local

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area plan. The local board review must be consistent with WIOA Sections 107(d)(11)(A) and (B)(i) and WIOA Section 232 to ensure alignment with its local area plan and the coordinating of the activities described in the local area plan. Applicants for WIOA title II grants are required to demonstrate alignment of proposed activities with the local area plan as one of the 13 required considerations under WIOA title II;

- Indicate when the local board must submit recommended WIOA title II eligible provider applications to the eligible agency, PA Department of Education (PDE);
- Describe how the local board will ensure it will make recommendations, if appropriate, to PDE to promote alignment with the local area plan; and
- Describe how the local board will coordinate WIOA title I workforce activities with those title II adult education and literacy activities designed to be associated with WIOA title I (i.e. for when the individuals participating in title I activities have basic education needs and when individuals in title II programs have needs that can be address through title I services or other services through the one-stop centers).

Note 1: Any WIOA title II activities described must be allowable activities under title II. These may include basic skills instruction both at the one-stop center and in other locations around the local area; compliant administration of standardized basic skills assessments; and workforce preparation activities for individuals receiving title II basic skills instruction.

Note 2: Guidance on the role the local board will play in their assistance with WIOA title II solicitation and procurement.

Local boards are not directly involved in WIOA title II solicitation and procurement; the title II competition is run solely by PDE, and all funding decisions are made solely by PDE. The local boards will review applications submitted to PDE for WIOA title II funds for alignment with the goals and strategies of the local area plan, and then provide recommendations to PDE on ways to improve alignment, if applicable.

Federal regulations require PDE to establish the process by which the local boards will review the WIOA title II applications for alignment with the local area plan and submit recommendations to PDE for improvement of alignment. PDE will receive the applications for title II funds and then distribute applications to the appropriate LWDB for review. PDE will develop related review documents and rubrics, and provide them to the local boards along with training on how to conduct the review and return the documents to PDE. All local boards must use the review documents and rubrics provided by PDE. Local boards have flexibility in determining which members of the local board participate in the review of applications. The review work can be led by local board staff, but cannot be limited to local board staff. Board members connected to entities that submit applications for WIOA title II funds or that have other conflicts of interest cannot participate in the review.

4.13. What services, activities and program resources will be provided to participants, including those outlined at WIOA Sec. 3(24), *Individuals with a Barrier to Employment*, in the local area?

Expectation: Narrative should list the services provided to participants beginning with the universal services (e.g. Wagner-Peyser Act based Employment Services), and concluding with a description of how individuals with a barrier(s) to employment are uniquely served.

- Describe how the one-stop delivery system employs a methodical process to intake customers, establish participant status, determine needs of the participant and identify any barrier(s) to employment;
- Describe how the one-stop delivery system employs a methodical outreach process that presents the benefits of the workforce development system to individuals and groups. A description of outreach activities may include information sessions regarding services that partner agencies provide and how to access such services. These outreach efforts may include presentations on available services that target certain populations, specifically targeting individuals with barrier(s) to employment;
- Describe how the one-stop delivery system provides the appropriate services and resources equally to participants; and
- Describe services provided to individuals with disabilities eligible for services under WIOA title IV.

4.14. What services, activities and program resources will be provided to businesses and employers, in the local area? [20 CFR § 679.560(b)(3)]

Expectation: The narrative should indicate:

- Roles performed by the PA CareerLink® Business Services Team (BST) within the scope of the region as a whole; describe the BST organizational structure as well as who manages the BST; describe coordination efforts amongst BST members as well as actions of the local board; and indicate the program providers that comprise the BST (e.g. Veteran program LVERs, OVR staff, Rapid Response staff);
- For program partners not specifically represented on the BST describe how these partners are connected to employers (e.g. provision of adult basic education and workplace literacy information to employers);
- Describe regional coordination of messaging and engagement; which program providers are making employer visits and the collaboration that occurs during these visits; and the management of tracking business related services and associated data analysis for all program partners to share;

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- What WIOA title III (Wagner-Peyser Act) employer-based services, as well as other services and resources made available from partners are made available to business customers; describe how the activities and services are accessed by business and employers or their legal representatives; and offer insight into how workforce-oriented programs and services are being adopted by businesses and employers in the region;
- **(Added) Describe how businesses and employers engage with education;** and
- If there are local board innovative practices such as the use of board staff and contracted entities providing business engagement activities and services, the narrative should detail the administrative and operational relationship between the BST and the local board business engagement efforts as well as demonstrating the reduction of duplicative services and activities.

4.15. How will the local board coordinate WIOA title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area? [20 CFR § 679.560(b)(10)]

Expectation: The narrative must explain the local area's set of strategies designed to:

- Identify supportive services and resources (e.g. transportation, public libraries, childcare, legal aid, housing, mental health, refugee and immigration services, vocational rehabilitation services, independent living services, community reentry programs); and
- Coordinate supportive services and resources to allow customers to participate.

5. COMPLIANCE

The questions in this section are focused on the local area's compliance with federal, state and local government requirements.

5.1. Describe the cooperative agreements that define how all local area service providers will carry out the requirements for integration of and access to the entire set of services available in the local area one-stop delivery system. [20 CFR § 679.560(b)(13)]

Expectation: This includes cooperative agreements (as defined in WIOA sec. 107(d)(11)) between the Local WDB or other local area entities described in WIOA sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under title I of the Rehabilitation Act (29 U.S.C. 720 et seq.) (other than sec. 112 or part C of that title (29 U.S.C. 732, 741) and subject to sec. 121(f)) in accordance with sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers and other efforts at cooperation, collaboration and coordination.

5.2. What is the process the local board uses to ensure the collection of the debts of lower-tier sub-recipients, as a result of audits?

Expectation: Narrative should describe the local board's debt-collection system and how grantees will utilize this system aggressively to ensure the collection of debts established as a result of sub-recipient audits. The narrative should also cover the procedures that will be followed by the grantee and fiscal agent, once a final determination of the amount of the disallowed costs has been made. Once the final determination has established the amount of disallowed costs, the grantee and fiscal agent must follow the procedures outlined herein to collect these disallowed costs.

5.3. What action(s) is the local board taking (or will take) towards becoming or remaining a high-performing board? [20 CFR § 679.560(b)(17)]

Note: Guidance pertaining to the actions a local board must take towards becoming or remaining a high-performing board are currently being developed. L&I considers a high-performing local board as a board that ensures the yearly attainment of goals, strategies and operational elements articulated in applicable law, regulation, contract(s) and agreement(s), PA Combined State Plan, Commonwealth policies, program grant and associated requirements and guidance are achieved; the board's varied responsibilities including fiduciary and administrative are performed in a professional manner; its mission of being accountable to the workforce area stakeholders is upheld; and abides by other factors as determined by the PA State Workforce Development Board.

Factors being considered by L&I include, but are not limited to:

- Attainment of the Governor's goals as described in the PA Combined Plan;
- Successfully performed by meeting the local area negotiated federal performance goals;
- Sustained fiscal integrity throughout the local area and all interactions on a regional level (include employment of appropriate fiscal practices such as the adoption of internal controls and more robust procurement policies);
- Attainment of successful monitoring reports and other evaluations by federal and state oversight staff;
- Creation and employment of workforce governance and service delivery 'best practices' that can be modeled;

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- Adoption and use of new and improved methods to reach and serve individuals with barriers to employment;
- Adoption and use of new career and training services provided for the WIOA title I programs;
- Attainment of Pennsylvania’s training expenditure targets;
- Successful regional coordinated employer engagement practices between local Business Service Team(s) and local board(s) direct activities; and
- Sector initiatives measured through the employment of qualitative and quantitative measurements.

Expectation: Narrative should address the fact that the local board will implement the actions necessary to become or remain a high-performing board once such guidance has been issued.

5.4. What is the process the local board uses to provide an opportunity to have input into the development of the local plan, particularly for representatives of business, education, labor organizations, program partners, public agencies and community stakeholders? [20 CFR § 679.560(b)(19)]

Expectation: Narrative should describe the robust collaboration among the many stakeholders to inform the contents of the plan. While WIOA and its associated regulations pay particular attention to the representatives of business, education and labor organizations, the narrative should include a description of the multiplicity of stakeholders that make up the local workforce system.

5.5. What is the process the local board uses to provide a 30-day public comment period prior to submission of the plan? [20 CFR § 679.560(b)(19)]

Expectation: Narrative should simply include a description of the process used by the local board (or planning region) to ensure the public had 30 days to review and comment on the contents of the proposed local area plan prior to its submission to the Commonwealth.

Note 1: In accordance with this policy, planning regions are required to post the entire regional plan for public comment in each of the local areas that make up the planning region.

Note 2: Comments submitted during the public comment period must be submitted along with the plan. Additionally, any comments made by a local board as a result of such comments, must also be included.

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ATTESTATIONS

By checking the box adjacent to each line item, the local board attests to ensuring the compliance components and documents listed are (or will be) in place and effective prior to June 30, 2017.

Each of the following components and documents should be current and available to L&I at any time during the planning process and monitoring or auditing processes. At this time, L&I is not requiring copies of such documents be attached to regional or local area plans.

- Agreement between all counties and other local governments, if applicable, establishing the consortium of local and chief elected officials.
- Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated.
- Agreement between the local area elected official(s) and the LWDB.
- LWDB policy and process that provides for nomination, appointment and removal of board members; resolutions; bylaws; code of conduct; and conflict of interest.
- Financial management policy and process including cost allocation plan; internal controls; cash management; receipts of goods; cost reimbursement; inventory and equipment; program income; travel reimbursement; audit requirements and resolution; annual report; property management; debt collection; and allowable costs.
- Local area procurement policy that must describe formal procurement procedures.
- (Added)** Local area MOU.
- (Revised)** Program management policies and processes addressing, at a minimum, layoff assistance; equal opportunity for customers; complaints and grievances; supportive services; needs related payments; incentives; file management; eligibility determination and verification; self-sufficiency criteria; self-attestation and certification random sampling; priority of service; stipends; training verification/refunds; individual training accounts; contracts for training services; statewide training providers list and eligibility verification; local area training provider list and eligibility criteria and process; "additional assistance" definition; transitional jobs thresholds; documentation for training expenditure targets; work-based training policies including incumbent worker training, OJT, CT, and apprenticeship.
- Risk management policy and process including records retention and public access; public records requests; monitoring, grievance; incident; and disaster recovery plan.
- Human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; discipline; layoffs, terminations and severance; sexual harassment; and equal opportunity and non-discrimination.
- Professional services contract(s) for administrative services such as staffing and payroll, if applicable.

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The *Multi-Year Planning Guide* is an operational workforce system guidance designed to aid local and regional area in the crafting of their plans in accordance with WIOA.

On Jan. 13, 2017, The Pennsylvania Department of Labor & Industry, or L&I, posted the proposed Workforce System Policy (WSP) No. 108-01, Multi-Year Planning Guide for a public comment period.

The comments received as a result of the public posting have been included below, as well as L&I's response to each of the comments submitted. L&I appreciates the stakeholders who contributed comments, as well as the Pennsylvania Workforce Development Association who submitted remarks on behalf of some of the local workforce system stakeholders.

General Comments

A commenter opined that the document appears to be very specific to local planning elements (more than 10 pages), while there are only about two (2) pages that address regional planning activities. The guidance seems to be somewhat contradictory to the emphasis of regional planning outlined in WIOA legislation. There is a concern this could result in Local Workforce Development Areas (LWDA) spending disproportionate resources to develop overly-detailed responses to local plans at the expense of strategically oriented regional plans. **Response:** L&I understands the commenter's concerns. Regional plans should describe regional market forces such as economic conditions and the general business landscape derived from thorough regional market analysis. Local areas must create a local plan that embodies a responsive vision and appropriate strategies to meet workforce development related opportunities and challenges as they exist in the local area and affect and contribute to the regional environment. Therefore, L&I considers regional and local plans to be equally significant. L&I has taken into consideration the commenter's assertion throughout the editing and revision of the final document.

Local Plans (pg. 3)

The local board, its respective chief elected official(s) and other executive decision-making officials of required and additional one-stop system partners within the region must ... **Comment:** A commenter stated "WIOA is clear that the local plan is the responsibility of the LWDBs and CEOs only. We recommend removing the "executive decision-making officials" portion of this sentence." **Response:** L&I appreciates the commenter's concern regarding the policy's inference that the WIOA local plan is the responsibility of entities other than the chief elected official(s) and the local board. L&I agrees, the chief elected official(s) and the local board are the responsible entities. However, the law and regulations are clear that meaningful input must be gathered from a multiplicity of local workforce system

stakeholders. This level of involvement necessitates collaboration and preparation of a plan that meets the parameters of all the required and additional one-stop system partners. Per WIOA Section 107 (d)(3), it is the function of the local board to convene, broker and leverage (including the role of bringing local workforce development system stakeholders together to assist in the development of the local plan). L&I did not make a change to this section of the narrative.

Local Areas, Local Partnerships (pg. 3)

"Local workforce system stakeholders must consider more robust partnerships for general effectiveness purposes ... Local cooperation may also lower costs and increase the effectiveness of service delivery through the coordination of shared services, processes and operation." **Comment:** A commenter suggested that this requirement should come with some guidance as to how to best facilitate these partnerships in a mutually beneficial way. **Response:** The commenter expressed concerns regarding engaging new and existing stakeholders and forging more substantial and meaningful relationships to increase the effectiveness of the system. L&I understands the challenges presented through the new language. WIOA mandates that local boards are the conveners of all stakeholders within their areas. L&I recognizes the expertise of the local boards in this capacity and encourages boards to use best practices and peer input to assist them in fulfilling this unique responsibility. There is no change to this language.

Note (pg. 4)

"Wherever a local area is part of a planning region, a local plan must be developed by the local boards and their respective chief elected official(s), in alignment with the regional plan and submitted as a component of that regional plan." **Comment:** A commenter opined that this statement implies a sequencing of plans be considered to truly match the intent of the regional plan to drive local plans. Developing them concurrently makes that difficult. This could mean that local areas have time to work within their region on a regional plan, and then use the completed, advertised, approved regional plan to develop aligning local plans. **Response:** The environmental analysis developed during the regional planning phase lays the foundation for the local plan's labor market analysis. L&I understands both the time constraints of crafting the plans consecutively and the difficulty that would be involved in developing the regional and local plans concurrently. L&I encourages regional and local planning coordinators to develop timelines that would allow the sufficient time to complete both plans, however the local area deems appropriate, before the required deadlines. Plans are required to be submitted to L&I by Sept. 1, 2017. In addition to the regional plans being approved, local plans must be posted for public comment for a period of 30 days. Finally, for efficiency, L&I must review local and regional plans concurrently, to fully

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comprehend and substantiate the correlation between the two.

Appendix B: Definitions, Required and Additional Partners (pg. 7)

Comment: A commenter suggested that this section implies that local areas will be wholly responsible for the recruitment and participation of partners in the local area. Based on past experience under WIA and efforts being put forth in other states, there seems to be opportunity under WIOA to encourage partners to engage and participate (both programmatically and financially) in the public workforce system at local and regional levels. Rather than placing this burden wholly on the local areas, the governor can help to align resources through guidance that provides local areas with the tools to effectively address this.

Response: WIOA Section 121 (d)(3) is the basis for the local boards' responsibility to ensure the required partners, and any additional partners as the local board deems appropriate, operate within the local one-stop system. The citation indicates: "The local board, with the agreement of the chief elected official, shall develop and enter into a memorandum of understanding (between the local board and the one-stop partners), consistent with paragraph (2), concerning the operation of the one-stop delivery system in the local area." Ultimately, it is the task of the local board to ensure the all the programs found at WIOA Section 121 (b)(1)(B) are represented within the one-stop delivery system. L&I understands the commenter's perception that the policy's definition of "required and additional partners" may lead some local boards to presume they are wholly responsible for the recruitment and participation of partners in the local area. L&I is collaborating with each of the state-level entities that represent programs directly and contract with third parties that provide the program services. This represents many of the programs listed at WIOA Section 121(b), but does not represent all programs.

Headings—Appendix C, Multi-Year Regional Plan Template Instructions (Planning Regions), and Appendix D, Multi-Year Regional Plan Template Instructions (All Local Areas), (pp. 8-21)

Comment: Several commenters expressed confusion with the headers for Appendix C, *Multi-year Regional Plan Template Instructions (Planning Regions)*, and Appendix D, *Multi-Year Regional Plan Template Instructions (All Local Areas)*. **Response:** L&I appreciates this comment and agrees that the titles appear confusing. As a result, L&I made several changes to these two (2) appendices. These instruction templates are to be used as a *guide* for regional and local plan drafters. L&I intends that Appendix C, *Multi-Year Regional Plan Instructions*, will be used to develop all regional plans and Appendix D, *Multi-Year Local Area Plan Instructions*, will be used in developing the local plans for all

local areas. To the extent possible, duplication between the regional and local plans was eliminated.

In addition to the guidance offered in these appendices, L&I will hold a planning summit for any interested person who will be involved in the development of the regional and local plans. Further information will be provided once the dates and times have been determined.

L&I will be available throughout the Multi-Year Plan development period to provide any assistance necessary. Questions can be submitted to the following resource account: RA-LI-BWDA-Policy@pa.gov.

Regional Planning Instructions, Question 1.6 (pg. 9)

Requiring "statistical demographic research of the various classes of individuals with barriers to ..."

Comment: L&I's CWIA indicates this information asked for this this question is not currently available. Local areas need a resource to gather this data. **Response:** L&I concedes that such information is not available and that the expectation cited in this portion of the policy is unreasonable. Therefore, the expectation has been revised so that staff can reasonably provide a sufficient response.

Local Planning Instructions, Strategic Planning Elements (pg. 11)

Comment: A commenter opined that this section requires a totally regional approach to the regional analysis with little or no recognition of the distinct, diverse LWDA needs across their PREP region. In some cases, these differences are dramatic. This allows for a challenging transition from this part to the remaining four (4) sections that are 100 percent local. It should not be assumed that a single local region does/will not **have** relationships with contiguous regions. Allowance should recognize region-to-region opportunities to better identify and address WIOA priorities. **Response:** L&I concedes that in some cases, there are differences, sometimes significant, between the regional analysis and the characteristics of a local area(s) that makes up the planning region. To address such variations, the planning instructions require local boards should provide a comparative analysis that describes similarities and differences between the narrative for the region and what is occurring in the local area. This narrative will provide stakeholders with an understanding why the goals and strategies do not fully align with the strategies of the planning region. Additionally, the local plan is where the unique local area characteristics or opportunities can be discussed such as the analysis of the local area's labor force. Finally, regions and local areas are encouraged to include narrative within the respective plan that touch upon the relationships and opportunities found outside the local area and region (e.g. local areas-regions-states outside the designated region). There is no change to this language.

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Local Planning Instructions, Question 1.4. (pg. 12)

Regarding the challenges, the region faces in aligning existing labor force skills and education and training activities with the needs of regional employers.... **Comment:** A commenter suggested that the policy includes any specific items L&I would like local and regional areas to address in this section—an expectation—as most of the other questions provide. This would also make Question 1.4 more aligned with the remaining questions that provide clear lists of expectations.

Response: L&I agrees and has revised the expectation associated with this question of the plan. As a result of this revision, Question 1.4 is now aligned with the remaining questions in that it provides a clear list of expectations.

Local Planning Instructions, Questions 2.4 and 3.2 (pgs. 13-15)

Require completion of both a performance measures table template and a program matrix template. **Comment:** A commenter suggested that L&I provide templates in preparation for the planning process. **Response:** L&I will provide ‘fillable’ templates separate from the actual policy. These templates will be located on L&I’s website just beneath this policy. The template instructions that are provided as appendices to the policy are for instructional purposes only. It is anticipated that all templates and attachments will be available shortly after the release of the final multi-year planning policy.

Local Planning Instructions, Question 3.2 (pgs. 14-15)

Comment: A commenter opined that the link to the “Program Matrix Template” is inoperable. **Response:** L&I did not intend to include a hyperlink for the “program matrix template” phrase and has corrected the formatting appropriately.

Local Planning Instructions, Question 3.4 (pgs. 15-16)

Regarding local area strategies to strengthen linkages between the PA CareerLink® service delivery system and unemployment insurance programs....

Comment: A commenter is concerned with the difficulty in responding to participants’ needs when Unemployment Compensation staff members are not co-located within a PA CareerLink® center and site. The commenter opined that UC staff presence in the PA CareerLink® centers would assist in

making these efforts more viable and effective. **Response:** L&I appreciates the commenter’s concern regarding the state-level entity providing the unemployment insurance (UI) required program and the lack of UI field staff within the one-stop delivery system. At this time, L&I is unable to provide unemployment compensation representatives in the PA CareerLink® sites. UI will continue to provide a courtesy phone in the PA CareerLink® sites. UI has also offered local area plan question expectations (within the plan template) to help local area planners craft a framework to generate an appropriate narrative response.

Local Planning Instructions, Question 4.3, sixth bullet (pg. 17)

“In conjunction with the state’s system ...” **Comment:** A commenter is concerned with a question’s expectation that references how any local area case management information system(s) will align with the one-stop system’s case management system of record, i.e. the Commonwealth Workforce Development System (CWDS). L&I understands other case management information system(s) are employed by either partner (Pennsylvania and other entities), contracted providers and by local areas. CWDS is not programmed to be interoperable with these duplicated participant case management information system(s), and for the foreseeable future, CWDS will not be interoperable with other data systems. L&I policy requires that all WIOA participant information be entered into CWDS in a timely manner. WIOA participant information entered into other case management information system(s) is not accounted for within L&I policy at this time. **Response:** L&I has edited the expectations to be clearer.

Local Planning Instructions, Question 4.12 (pgs. 20-21)

Comment: A commenter asked if there will be additional guidance for Question 4.11 (was question 4.12 in the draft) as to how the coordination of title II services should look, now and within what timeframes that will change.

Response: L&I appreciates the commenter’s question regarding the WIOA title II program and expectations as well as a desire for additional guidance from the PA Department of Education (PDE). The expectation associated with this question has been revised. In addition to the expectation, PDE provided additional guidance to aid in this portion of the plan narrative, as well as instructions regarding how local boards are engaged in the coordination process.