

## Appendix A: Epilogue

The following public comments and the Pennsylvania Department of Labor & Industry (L&I) responses pertain to the proposed changes to the Commonwealth's WIOA Regional and Local Area Plans policy package. Comments were collected during the public comment period from July 12, 2024, to August 12, 2024. All public comments received pertain to either the Regional Plan Instructions or the Local Area Plan Instructions.

L&I appreciates all local workforce system stakeholders who contributed comments.

### **Comment:**

In order to promote more streamlined, accessible, and effective WIOA local area plans, a commenter recommended that the prompts and associated expectations found within the *Local Area Plan instructions, Section 1: Local Area Economic and Workforce Analysis* should focus exclusively on providing an analysis of the local area's labor market and workforce dynamics.

Also, the commenter stated some of Section 1's prompts and respective expectations require local areas to describe specific local area strategies, initiatives, and programming. However, other local area plan sections require similar strategic, initiative, and programming information. The commenter stated these cross-referenced Section 1 prompt requirements increases duplicative plan information.

The commenter requested that the Commonwealth revise the *Local Area Plan Instructions, Section 1* to focus exclusively on describing current economic and labor market conditions. Subsequent sections should then outline the vision, goals, strategies, and program elements that will address these conditions.

### **Response:**

L&I respectfully disagrees. While sections of the local area plan may overlap in topics, the required level of narrative detail can vary. If a local area finds that a Section 1 prompt or its respective expectation is better explained in another section of the plan, the local workforce development board may reference that section within their Section 1 narrative response (e.g., 'For more detail regarding Engage! linkage between workforce and economic development throughout the LWDA, see L4.2').

### **Comment:**

A commenter indicated prompts 2.1 and 2.2 in the *Local Area Plan Instructions* are currently written in a way that may result in significant duplication. The commenter detailed a specific list of prompts and respective expectations found within prompt 2.2 that could more easily be addressed in prompt 2.1.

The commenter suggested that the Commonwealth combine prompts 2.1 and 2.2 to create a more concise overview of the local area's vision and goals, highlighting their alignment with the Commonwealth's workforce development goals.

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### **Response:**

This comment is appreciated, and L&I agrees that since a local board is already describing its strategic vision and goals in prompt 2.1, elements described in prompt 2.2 should also be included to avoid any possible duplicative narrative and lessen administrative burdens. L&I revised local area plan prompt 2.1 accordingly.

### **Comment:**

A commenter indicated that the *Local Area Plan Instructions* should ensure the prompt expectations and their respective factors are aligned with the level of detail intended for each of the five plan sections. The *Local Area Plan Instructions* outline the purpose of each section at the beginning of the respective sections. The commenter explained the level of detail indicated in each of the five plan section purposes is logical and has the potential to create a reasonable flow of information throughout the local area's plan. However, multiple expectations and their corresponding factors within each plan section seem misaligned with the stated purpose of those sections. The commenter provided specific examples.

The commenter suggested revising the noted expectations and factors to ensure the requested information aligns more closely with the intended level of detail for each section.

### **Response:**

L&I respectfully disagrees. While sections of the local area plan may overlap in topics, the required level of narrative detail can vary. If a local area finds that a prompt or expectation is better explained in another section of the plan, the local workforce development board may reference that section in their narrative response.

### **Comment:**

A commenter highlighted two specific instances where there is misalignment within the WIOA Regional and Local Area Plan Instructions and Pennsylvania's WIOA Combined State Plan. Per the PA WIOA Combined State Plan:

1. On page 41, "the Commonwealth will continue to promote and encourage opportunities in programs such as YouthBuild, Job Corps, and Pennsylvania Outdoor Corps, and require WIOA regional and local plans to include these programs, when available." The commenter explained there is no reference to *Pennsylvania Outdoor Corps* in either the regional or local area plan instructions.
2. On pages 159-160, there are twelve bulleted local area plan requirements that surround WIOA priority of service. The commenter indicated many of these requirements are not found within the local area plan instructions.

The commenter requested that the Commonwealth incorporate these two considerations into the regional and/or local area plan instructions as appropriate.

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### **Response:**

L&I agrees with the commenter's assessment. Each local board, in collaboration with local area stakeholders, must produce a WIOA regional (if applicable) and local area plan that embodies the Commonwealth's vision, goals, objectives, and strategies of WIOA, as found in the *PA WIOA Combined State Plan*, as well as certain administrative and operational elements or processes.

A reference to the *Pennsylvania Outdoor Corps* has been added to regional plan prompt 1.4 and local area plan prompt 3.4, expectation 4. Additionally, the bullet points previously identified as missing in the local area plan instructions, but present in the *PA WIOA Combined State Plan*, have now been incorporated into local area plan prompt 3.3.