PUBLIC COMMENTS RECEIVED ON *TALENT AND PROSPERITY FOR ALL*

Comment by:	Section	Comment	Resolution
Arthur Swannack, Whitman County Board of Commissioners	Strategic Section of TAP	I am writing to express my concerns regarding the inclusion of the Senior Community Service Employment Program (SCSEP) (otherwise known as Title V) being included in the Washington Workforce Plan. I believe there can be several unintended consequences from this decision if not carefully implemented, not the least of which is subjecting Seniors eligible for SCSEP to standards which don't match the intent of the SCSEP program. SCSEP is intended to help older seniors (homeless, 75yr+ old, limited English speaking, low employment prospects and veteran status) to jobs which help make their life better. We know these individuals have different prospects for employment and credential attainment compared to the usual individuals for which standards of training and credentials have been designed in the past. We cannot measure their outcomes the same way you would measure an individual achieving a GED or being retrained at age 30 to reenter the workforce. Our measurements of success must fit the intended participants of the SCSEP program. The inclusion of SCSEP in the plan, if that is your final decision, must be tempered with wisdom and thoughtfulness including how to serve Seniors with the above mentioned limitations. These individuals are not the traditional patrons of workforce development actions and plans. Technology is not readily accessible and/or used by many older workers and individuals residing in rural communities. In fact many rural areas have limited internet access, even if the individual is somewhat skilled in computer operation. I ask you to keep access available which doesn't require computer use as the only method of accessing services.	The review team determined that this commenter did not realize that the SCSEP program will not be subject to the WIOA performance metrics. A response will be sent to this commenter to provide this information.
Caitlyn Jekel	Business Services Prioritizing Job Quality	Pg. 29 or 31? Job Seekers enter the workforce system at varied employment levels, but the ultimate goal of the workforce system is to strengthen the middle class. Business services strategies should seek to grow jobs with family sustaining wages and benefits, encourage ongoing sill training and employee advancement, good working conditions and adequate hours, and the right to join a union. This is key to the return on investment of limited WIOA resources.	The review team concurred and added the following amendment on page 28. Jobseekers enter the workforce system with varied skills and experiences, but the ultimate goal of the workforce system is to create pathways to prosperity for all. Business services strategies should seek to grow jobs with family sustaining wages and benefits encourage ongoing skill training and employee advancement; promote good working conditions, and adequate hours, while recognizing the right to join a union. Washington will consider job quality when engaging with businesses to offer work-based learning, on-the-job training,

		Washington will consider job quality in providing services to employers by prioritizing funds to be used for work-based learning, on-the-job training, incumbent worker training, and customized business services	incumbent worker training, and customized business services.
Caitlyn Jekel	Professional Development	In addition to partner agencies, Washington will work with employer and labor leaders to provide training and technical assistance to representatives on state and local workforce boards, including the sponsorship of training for representatives on their duties on boards. The state will strive to offer specific tools, including performance accountability, needed to help Washington achieve a high road workforce system.	Review team concurred. The suggested language was inserted into page 10.
City of Seattle, Mayor Ed Murray	Adult Education & ELA Learning Needs	Is there comprehensive data and information informing the strategic plan that depicts the range and scope of adult learning and development needs of the various populations with barriers? In particular, is there comprehensive data and information regarding the range of learning needs of the various groups that are the focus of WIOA Title II Adult Education Services? These groups include, a) adults with less than a high school degree or equivalent; b) individuals with very low levels of education and/or basic skills; c) foreign-born individuals who have not attained U.S. citizenship; and f) foreign-born, college-educated (or higher) individuals who obtained their education abroad.	Review team carefully considered all of this commentator's thoughtful questions, but deemed them not to be comments on the content of the plan itself. Workforce Board staff will correspond with the City of Seattle to address their specific questions on data and performance monitoring, and work with local WDC partners to address barrier removal efforts specific to Seattle-King County.
City of Seattle, Mayor Ed Murray	Data and Information: size and scope of priority services populations	Does existing data and information capture the most accurate estimates of the size and scope of priority services populations upon which to develop comprehensive plans, program designs, and goals to guide the eventual allocation and equitable distribution of resources? Can the strategic plan identify the number and share of individuals from the various sub-groups facing barriers in and of priority services?	Review team carefully considered all of this commentator's thoughtful questions, but deemed them not to be comments on the content of the plan itself. Workforce Board staff will correspond with the City of Seattle to address their specific questions on data and performance monitoring, and work with local WDC partners to address barrier removal efforts specific to Seattle-King County.
City of Seattle, Mayor Ed Murray	Monitoring Performance of Equity Outcomes	What mechanisms in the monitoring and appraisal of performance will track the degree to which those designated for priority of service are represented in equitable proportions?	Review team carefully considered all of this commentator's thoughtful questions, but deemed them not to be comments on the content of the plan itself. Workforce Board staff will correspond with the City of Seattle to address their specific questions on data and performance monitoring, and work with local WDC partners to address barrier removal efforts specific to Seattle-King County.
City of Seattle, Mayor Ed	Allocation of	In addition to the efforts and processes for "barrier removal" set forth	Review team carefully considered all of this commentator's thoughtful

Murray	resources for populations with barriers and adult learners	in the strategic plan, does it enable the allocation of dedicated funding for the design, development, and implementation of populations-specific programs that will serve priority groups? What criteria will guide the selection of targeted programs to be implemented and the allocation of resources to support them?	questions, but deemed them not to be comments on the content of the plan itself. Workforce Board staff will correspond with the City of Seattle to address their specific questions on data and performance monitoring, and work with local WDC partners to address barrier removal efforts specific to Seattle-King County.
Council of Presidents		Attached are proposed changes for incorporation into the report from our sector. The changes focus on two major elements. Too often when policymakers think of workforce training they focus only on skill development and technical education and leave absent from the conversation the value of postsecondary degree attainment. To build on the recognition within the report that the role of postsecondary education is a critical part of workforce development and training, we recommend the inclusion of additional language to highlight postsecondary education as an important pathway to the success of our state. In addition, when postsecondary education is part of the workforce training discussion, the focus is often solely on our partners in the community and technical college sector. The community and technical colleges are a strong leader in workforce training and their mission offers them the opportunity to meet multiple aspects of workforce development beyond educational attainment. However, in recent years Washington's public baccalaureates have proactively engaged in partnering with industry to align workforce, student and academic needs. In addition, baccalaureate and graduate degrees are increasingly becoming required credentials for more industries and careers. We would ask that you consider our suggested edits to expand the existing language in the report: • Expand the existing language that highlights *Bachelors in Applied Science (BAS) degrees* to include *Baccalaureate and Graduate degree programs*. The BAS degrees is one type of postsecondary degree, in addition to baccalaureate degrees and graduate degrees,	Review team concurred. Language amendments accepted; changes made.

		that is in demand in the state's workforce. In addition, BAS degrees are not solely offered by our community and technical colleges, but also by institutions within our sector. • Expand the existing language that highlights *Community and Technical College Workforce Program Advisory Boards* to include *Post-Secondary Workforce and Education Program Advisory Boards*. Increasingly, our colleges and universities are formalizing partnerships with industry through advisory boards to link academic degree programs with workforce needs.	
Department of Commerce	Operational Section – Specific Program Components **CDBG**	Begin the Community Development Block Grant section with this beginning which is similar to how the Community Services Block Grant section above it begins: "The state Community Development Block Grant (CDBG), administered by the Department of Commerce, awards HUD funds to rural local governments for locally-prioritized activities." (Page 58)	Review Team concurred. Language change made and accepted.
Department of Commerce	Operational Section – Specific Program Components **CDBG**	Begin the Community Development Block Grant section with this beginning which is similar to how the Community Services Block Grant section above it begins: "The state Community Development Block Grant (CDBG), administered by the Department of Commerce, awards HUD funds to rural local governments for locally-prioritized activities." (Page 72)	Review Team concurred. Language change made and accepted.
Department of Commerce	Operational Section – Specific Program Components **CSBG**	Nothing to contribute from the state CSBG perspective. CSBG activities support services to eligible individuals and households at or below or below 125% of FPL. These services are not directly applicable to employers. (Pg 86)	Review Team concurred. Language change made and accepted.
Department of Commerce	Operational Section – Specific Program Components **CSBG**	Community Services Block Grant [Nothing to contribute for CSBG] (pg 99)	Review Team concurred. Language change made and accepted.
Department of Commerce	Operational Section – Specific	Add the funding source clarifier to the first sentence of the Community Development Block Grant section:	Review Team concurred. Language change made and accepted.

	Program Components **CDBG**	"The state Community Development Block Grant program, administered by the state Department of Commerce, awards <u>HUD</u> funds to rural local governments…" (Page 100)	
Department of Commerce	Operational Section – Specific Program Components **CDBG**	Integrate the CDBG description below that was submitted earlier, or this description can edited for consistency with other programs as long as it doesn't include additional CDBG program commitments: <u>"The state Community Development Block Grant program administered by the state Department of Commerce awards HUD funds to rural local governments for locally-prioritized activities. CDBG eligible activities could include economic development, construction, and public services activities. If a rural local government applies for and receives CDBG C funding for a job creation activity, the business will be required to coordinate job recruitment and hiring with the regional WorkSource/one-stop center. If a local government applies for and receives CDBG funding for job training services, the training program (in most cases a community action program) will align with the State's WIOA strategies. Any CDBG funded construction activities must comply with the Davis Bacon Act, including registration with the federal Department of Labor or DOL-recognized State Apprenticeship Council when apprentices are employed. CDBG funded contracts must comply with Section 3 of the Housing and Urban Development Act of 1968."</u> (Page 355)	Review Team concurred. Language change made and accepted.
Department of Commerce	Business Engagement	1) Sector name corrections (see comment #3 above) 2) Suggest adding language explaining the reason for having statewide sector strategy: <u>Our sector-based economic development strategy is a reflection of the fact that we face intense international and interstate competition for good jobs. We have to be constantly vigilant about identifying opportunities and strategies for supporting existing employers and cultivating new ones in Washington -- we can't rely on luck for the next Boeing, Microsoft or Amazon to land here.</u> (Last sentence, page 1 re: sector lead appointments)	Review Team concurred. Language change made and accepted.
Department of Commerce	Business Engagement	*(Engagement of business as a partner through sector strategies)* Suggest adding language to specify that the Governor's Sector Leads	Review team did not concur and asked to have this referred in two-year plan revision.

		will be directly engaged where regional sector strategies and statewide business engagement initiatives correspond with sectors served by Sector Leads. (Page 4-5)	
Department of Commerce	Business Engagement	*(Train staff on business engagement)* Suggest adding language stating that one of the outcomes of training staff on serving business customers is that it will mean there is no "wrong" door through which a business might connect with the workforce system. This means that staff members are equipped to assess an employer's immediate needs as well as being capable of establishing a connection with the business in order to engage them in an ongoing relationship with the workforce development system.(Page 6)	The review team did not concur. The Business Engagement experience is meant to be focused through local business engagement teams.
Department of Commerce	Operational Section – Specific Program Components **UI**	Heading typo: (**Unemployment** Insurance) (page 42)	Review Team concurred. Language change made and accepted.
Department of Commerce	Operational Section – Specific Program Components **CSBG/CDBG**	Heading correction and content edits: Community Services Block Grant/Community Development Block Grant *Edit:* ~~Nothing to contribute from the state CSBG perspective. These activities are determined at the local level by the CSBG grantee.~~ The state Community Services Block Grant (CSBG), administered by the Department of Commerce, awards funds to local community action agencies to provide services to low-income households at or below 125% of the federal poverty level (FPL). CSBG Grantees determine how funding will be used to support allowable CSBG activities, such as employment and training activities. This funding is administered federally by the Department of Health and Human Services (HHS). The state Community Development Block Grant (CDBG) program, administered by the state Department of Commerce, awards HUD funds to rural local governments for locally-prioritized activities, such as economic development, construction, and public services activities.	Review Team concurred. Language change made and accepted.

		These funds are awarded based on a competitive grant process for eligible CDBG recipients. This funding is administered federally by the Department of Housing and Urban Development (HUD). (Page 43)	
Department of Commerce		*Providing access to disadvantaged communities* Suggest including the example of communities impacted by natural disasters in both strategic and operational sections for serving disadvantaged communities. Commerce continues to heighten its coordination in support of disaster-impacted communities and businesses, and would like to increase our coordination to include strategic and operational aspects with the workforce system.	Review team did not concur and did not make amendments in response to this comment.
Department of Commerce	Section 1, TAP	*(Table) Workforce System partners in this approach include, but are not limited to:* The CDBG and CSBG programs are grouped together here. If this listing is not intentionally grouped, based on the state agency (both are housed in Commerce), consider separating them into different rows. They are not co-administered. (*descriptions of each provided*) (page 11)	Review Team concurred. Language change made and accepted.
Department of Commerce	Business Engagement	*Critical Industry Sectors (text box)* Suggested edit: Governor Inslee created the Office of Economic Development and Competitiveness in the Department of Commerce to work with critical industry leaders on recruiting new companies to Washington and grow key industry sectors statewide. (Page 1)	Review Team concurred. Language change made and accepted.
Department of Commerce	Business Engagement	*Critical Industry Sectors (text box)* Sector name corrections: • Aerospace • Agriculture • Clean ~~Energy~~ Technology • Forest Products • Information, ~~and~~ Communication Technology • Life Science~~s~~ and Global Health • Maritime ~~Industries~~ • Military and Defense (Page 1)	Review Team concurred. Language change made and accepted.
DVR	Strategic Section	**Page 3** Please consider the following change the 3rd paragraph on this page:	Review team concurred with this change and amended the paragraph as requested.

		While she was in school, she spent her summers looking for a job. Time after time, business after business and there were no interviews, no opportunities. How could she find a job? How could she, one day, have a home and raise a family when all the employers saw was her disability?	
Erin Frasier SBCTC		**PG. 54**: Should the strategies for success workshops be better referenced as employability skills training? They are not job search activities. *(last sentence, last paragraph)*	Review Team made edits to this sentence to reflect ESD's role within this program.
Erin Frasier, SBCTC	P. 4 & 5 Strategic Section	Add source citations for the data.	Inserted relevant citations to plan.
Erin Frasier, SBCTC	P. 5	*"conducted in 2012"* – If the survey referenced is done every 2 years, should this data be updated to the 2014 survey?	The survey is conducted periodically; reference to every two years was modified.
Erin Frasier, SBCTC	Pg. 7	Should data on the percentage of the workforce with each level of education be included?	Space has been made to insert this information
Erin Frasier, SBCTC	Pg. 7	*"but the low high school diploma attainment rate remains a concern."* What is the rate?	This information will be inserted.
Erin Frasier, SBCTC	Pg. 8 – Describe apparent skill gaps	This section could benefit from specific data identifying industries or occupations with the largest projected skills gaps – add to the end of this section.	Space has been made to insert data from the SBCTC/WSAC/WTB joint skills gap report.
Jamie McIntyre, DSHS/AA/ALTCEW	SCSEP	ALTCEW staff have significant concerns regarding the inclusion of SCSEP in the plan. Specifically, the needs, employment prospects and abilities of older workers are starkly different from that of a younger workforce. Program guidelines and performance measures should be set to meet the needs of older workers.	The review team responded: SCSEP is *not* a mandatory partner, not subject to the core performance measures, and not required to staff the one-stops.
Jamie McIntyre, DSHS/AA/ALTCEW	SCSEP	Maintain the availability of access to services through no wrong door. Currently, potential participants are able to access services through agencies who directly provide services. The new proposed standards that place a greater emphasis on technology and front door to services through One-Stops do not align with the needs of older workers. With 12 allocated participant slots and approximately 25 people on the waiting list, having a technology One-Stop center isn't necessary given the small size of the program and amount of demand currently seen through normal outreach. ALTCEW maintains a MOU with our local One-Stop, WorkSource, and this has been more than sufficient for the	The review team responded: SCSEP is *not* a mandatory partner, not subject to the core performance measures, and not required to staff the one-stops.

		funded size of the program. The program links participants with WorkSource as part of the MOU. Our team has seen that participants often lack the confidence and knowledge needed to access the One-Stops and through support and education from ALTCEW staff, program participants are connected to this resource. Additionally, technology is not as readily accessible and used by many older workers and individuals residing in rural communities. Nationally and locally the number one skill need for participants is computer training. By creating the point of access at a paperless, One-Stop electronic center, we will be excluding many older workers from accessing services. As an Area Agency on Aging, we are the appropriate front door for services for older workers interested in SCSEP.	The review team found that this issue is addressed in the plan and refers commenter to the accessibility/technology section of the plan.
Jamie McIntyre, DSHS/AA/ALTCEW	SCSEP	Create performance measures that are realistic to the workforce potential of older workers. SCSEP's purpose is to reengage older adult in their local communities by placing them at local non-profit or governmental organizations. Participants provide an added value to their organizations and work in positions that are not essential to the daily operations. Older workers targeted by SCSEP typically do not maintain in the workforce as long and do not have the same earning potential. Currently the SCSEP program targets vulnerable, low income and high risk individuals including: homeless, 75 years of age or older, limited English speaking, low employment prospects, and veteran status. These vulnerable populations of older workers often do not have the same employment prospects in yielding credential attainment and earning potential. Be cautious in setting performance standards that they do not exclude vulnerable populations from participating in gaining valuable job skills, supplemental income, and employment opportunities.	The review team responded: SCSEP is *not* a mandatory partner, not subject to the core performance measures, and not required to staff the one-stops.
Mark Mattke	P. 5	*"Between 1992 and 2022"* Including the past 24 years seems irrelevant. Can the data be modified to be 2016-2022?	While review team concurred, changes in this specific data cannot be changed in this plan.
Max Biringer, Jewish Family Service, Kent WA	Accessibility and Technology	Plans to increase technology accessibility of program features, including universal Wi-Fi access in one stop centers will make the process	Review team found that this comment was about comprehensive one-stops having the wireless access to facilitate their job search. The Workforce Board

	Strategic Section of TAP	significantly easier for many public assistance clients. However, as noted, "many will require training on baseline technological skills needed to use these tools." This statement would apply to at least 50% if not more of the refugee and immigrant clients our agency serves. Will it be the responsibility of service providers and CBOs to provide this training to allow their clients to access said technology and would funding be provided? Expanding online job matching services to include more employers and more industries would definitely make a large difference to job searchers, and I would hope that these processes and materials would be available in the wide range of languages our clients speak. One suggestion to help remedy these concerns would be including ELL and refugee service experts in the Workforce Board committees being created to monitor and manage accessibility and technology issues.	will respond to this commenter with information that highlights the system's efforts to include immigrant and refugee communities specifically. Review team asked that the Accessibility Committee policy recommendation be shared with this commenter.
Max Biringer, Jewish Family Service, Kent WA	TANF (Operational Section of TAP)	It is an excellent change that WIOA measures will redesign one stop work development systems to allow better access for disadvantaged populations. Accessing WorkFirst centers as they exist now is above the ability of most of our clients. However, it is unclear to me how this will be implemented. On Page 443 the report makes mention of a client's rights to have the criteria of eligibility determination, rights and responsibilities, and program options explained to them. I wanted to make sure all of this could be done in a client's native language with certified interpreters provided by the WorkFirst site, as well as translated decision related documents being made available to the clients.	The review team asked that this comment be responded by letter to Mr. Biringer. Efforts are already in place to publish documents in various languages, and there are many methods of providing interpretive services. There are state and federal statutory obligations to provide services to barriered populations.
Pam Haight (Career TREK Program) Community Youth Services		Excellent overview of our state-wide plan and recommended practices. It has been very helpful having this information to better understand our state priorities and to get more experience with the language and interpretation of WIOA. The plan will be good reference as we move ahead with our programming for youth. Thank you for all your effort! **My only recommendation is to clarify 'customer' throughout (business**	Review team concurred. Language throughout has been clarified.

		or worker).	
SBCTC	Pg 141	Asked to insert information about I-BEST at Work	Review team concurred. Language enhanced.
Seattle King County WDC	Strategic Section	Through our numerous WIOA planning community town hall meetings and during focus group work with board members, an overarching theme has been to ensure the establishment of a system that is strong in providing quality and customized services for job seekers with barriers. Given the high level of diversity in our area, it is critical that services be designed to target the special needs of these customer groups. Strengthening language in that regard will be greatly appreciated.	Review team concurred. Language added.
Seattle King County WDC	Service Delivery Integration	Many of the components listed here use will and should statements. While we would like to envision standardized process for things like intake/greeting, triage and follow-up, etc., any of these steps may look different for each individual customer. To accommodate this model to the depth of customers the WorkSource system sees, **statements in this section should include "may" rather than "will".** (pg. 16)	Review team considered comment, but without specificity as to which "will" statements should be changed to "may," team was unable to integrate comments. Also, many provisions in this plan containing "will" statements are meant to be prescriptive. Where additional guidance is needed on mandates within the plan, system partners will issue such.
Seattle King County WDC	Service Delivery Integration	Intake (pg. 16▯ *First interview* should instead be *Greeting and Customer Engagement* *Gathered information* should note through Monster system	Comment not accepted. Review team felt "Greeting and Customer Engagement" was too specific and did not reflect system-wide consensus.
Seattle King County WDC	Service Delivery Integration	Triage and Follow-up (pg. 16) • The navigator term can have different meanings in different contexts. We prefer the term Career Counselor or Greeter for this role in the WorkSource system. • The CASAS test is designed for high school level and below assessment. This type of assessment tool is not universal for all WorkSource customers. • It should be noted that this part of the process will look different for every individual. Some customers come to WorkSource work ready, some need training, others need language assistance.	(1) Review team agreed to keep term "navigator" for consistency. (2) ABE also uses CASAS, and while it isn't universally administered, it is widely administered and we would like to encourage its use for customers in need of adult education.
Seattle King County WDC	Service Delivery	Case Management (pg. 16)	(1) Review team decided to keep term "Case Management" instead of

	Integration	• This section should be called *Career Counseling.* Case Management implies a different relationship. • Remove *Ideally, customers should not be assigned to more than one case manager.* Often a team of counselors can work with one individual as we try to move past the "case management" philosophy. • Change: *However, if necessary, case managers will work as a team…* to *WorkSource staff will work as a team….*	"Career Counseling." (2) Review team agreed with comment to remove "*Ideally, customers should not be assigned…*" and made requested change.
Seattle King County WDC	Service Delivery Integration	Replication of Promising Practices (pg. 20-22) There are many cross-program promising practices here, however there are many from the local WDC level which are not represented, such as Sector Panels, Cohort Training, Cross-regional sector specific partnerships, In-community outreach methods, and more. It would be great to solicit a few more promising practices from Adult/DW/Youth programs.	Review team accepted comment. Added "among many others" to text to clarify that the listed approaches are NOT the only successful approaches.
Seattle King County WDC	Engaging Business for Better Results	Centers of excellence are a great example of business engagement. Given that local boards lead business engagement, it might also be beneficial to highlight leadership and success at the local level.	Review team agreed with comment, but lacked specific examples to set in text. We will work with local WDCs to highlight in future plan.
Seattle King County WDC	Engaging Business for Better Results	Business Engagement Goals (pg 25) ⬜ If these business engagement goals and percentage increases (20% increases each year) flow down to local areas, they don't take into account relative numbers of businesses (especially the proportion of small business) and the number of businesses currently engaged. With the high numbers of businesses engaged in some areas, are these increases attainable/measurable?	Reviewers agreed with comments. The Strategic Plan draft goals were not synced with the goals in the Operational Plan when it went out for comment. These goals have been aligned, and the increase goal has been substantially reduced to 5%. Moreover, an emphasis has been placed on establishing meaningful metrics to identify a baseline as a preliminary step to measuring and improving business engagement efforts.
Seattle King County WDC	Engaging Business for Better Results	Making workforce services more transparent accessible and user-friendly (pg 29-30) ⬜ "*Identify/invest in business navigators*": What are business navigators? This term is used inconsistently. Speaking the language ⬜ "*Speak the language of business…Create a common brand":* We agree that these are important components, but it should be acknowledged that the language and marketing to businesses isn't universal to all "businesses." Marketing is dependent on audience and sector, size, and type of business should all be considerations in the language and	• Review team concurred and revised this language to: *Business Navigators, the industry outreach teams assembled and led at the local level, must…* • The review team concurred.

		branding of WorkSource business services.	
Seattle King County WDC **Partial:** *(comment added)*	Engaging Business for Better Results	**The role of WDCs (pg 31)** ▢ Thank you for including this: Facilitating information sharing among WorkSource system partners and businesses should be included as a way that WDCs exercise leadership responsibility. ▢ This should also be included in the operational descriptions of business services on **page 67**.	Review team concurred. Language included already.
Seattle King County WDC	Engaging Business for Better Results	**Summary and Goals (pg 31-32)** ▢ Again, are these percent increases attainable? That is highly dependent on the "baseline" and the area's business population, current engagement saturation, and proportion of small to large businesses. Also are these realistic goals for staff without increased investments each year?	Review team concurred: The business engagement goals have been modified to identifying meaningful metrics to establish baselines. Therefore, baselines will be established first and the percentage increases will be considered for modification once baselines have been established.
Seattle King County WDC	Engaging Business for Better Results	**Sector Partnership Framework (pg 35)** ▢ It is unclear whether this framework is to be used for each individual sector or to develop an overall sector strategy. ▢ This tool says to "Evaluate against 10+ considerations relating to growth…" What are the 10+ considerations? Please provide a reference.	Review team refers this commenter to the Local plan guidelines for clarity.
Seattle King County WDC	Engaging Business for Better Results	**Criteria for Identifying and Prioritizing Target Sectors (pg 36-37)** ▢ Given the reliance on NAICS codes to define sectors, the qualitative and quantitative validations should acknowledge the limitations of defining sectors according to these codes. NAICS codes are valuable, but cannot be the sole source of data for defining sectors.	Review team concurred: the following language was added to page 38: *Because of the qualitative and quantitative limitations of defining sectors only by NAICS codes, they need not be the single source of data.*
Seattle King County WDC	Engaging Business for Better Results	**Common Definitions (pg 37)** ▢▢"Sector" is defined as "categorized by the North American Industry Classification System (NAICS)…" As noted above, NAICS codes cannot be the sole source of data for defining sectors.	Review team concurred: the following language was added to page 38: *Because of the qualitative and quantitative limitations of defining sectors only by NAICS codes, they need not be the single source of data.*
Seattle King County WDC	Accessibility and Technology	Thinking Beyond Technology: Removing resistant workforce system barriers (local and state advisory groups on barrier solutions) **(pg 46)** ▢ To make this language consistent with the task force and state board recommendation- " Each local workforce development board will designate either one of these existing advisory groups or create a new	Review team concurred and accepted suggested language.

		one to focus on barrier removal work, and will seek to recruit members from a broad spectrum of populations with barriers, including, (***add: but not limited to***): …..”	
Seattle King County WDC	Operational and Program-Specific Components	**State Strategies for sector strategies and career pathways (c) (1) (pg 13):** o This sections lists some great statewide strategies, however it would also be beneficial to cite local examples in the WIOA Adult/DW system, such as Sector Panels led by local WDCs.	The review team agrees that local examples would be beneficial. Space will be made to include local examples in the 2-year plan revision.
Seattle King County WDC	Operational and Program-Specific Components	**Operational Elements, Implementation of State Strategy, Core Program Activities to Implement the State Strategy (3)(A) (pg 23):** o Within the Title 1 Section, it would be helpful to reference the MOUs as agreed upon and (to be agreed upon) by WWA and DVR, ESD, DSHS, and ABE. Furthermore, local coordination will be detailed in local plans and local WorkSource agreements. o **Page 23 -** Youth**:** Coordination with OSPI should also occur around out-of-school youth (through its Open Doors program).The Youth section can cite the opportunity for co-enrollment of youth participants across core programs, in particular for youth ages 18-24 who can be served through Title I Adult/Dislocated Worker, Title II Adult Education and Literacy, and Title IV Vocational Rehabilitation. **Page 24**– Adult: automatic co-enrollment between W-P in **all local areas** is the goal Last bullet: “disability is a priority of service criteria” –It is unclear why this is category is called out when there are other priority of service areas/populations that are not listed. Add: co-enrollment models for older youth as noted above Co-enrollment should be encouraged through WIOA Title I Adult and WIOA Title II Adult Education and Literacy. **Page 24** – DW: First bullet: include coordination with Commissioner Approved Training/Training Benefits **Page 25**– Basic career services (A and DW): This entire section should include W-P (e.g. eligibility, orientation, assessment etc.) if we’re going to be co-enrolling in WIOA Adult	• MOUs –The review team determined that these are locally developed and that inclusion here is not necessary. – no change. • Coordination with Open Doors program – accepted as to collaborating to serve out-of-school youth – The change however was moved to page 49. • The team determined that co-enrollment is still in the early stage and not universally adopted, so it should be included in the local plan where appropriate, but not in the state plan at this time. • Co-enrollment is a long-term goal, however the state is not ready to mandate this through the state plan process. • The sentence on priority of service was reworded, based on this comment. • The review team has determined that co-enrollment is still in the early stage, and should be included in the local plan where appropriate, but not in the state plan at this time. • The bullet was revised to reflect the comment. • ICR separates W0PO services from Title I services. To the extent those services are co-enrolled; they will be addressed in plan revisions. • The “one-stop delivery system” is meant to include all workforce system partners, not merely those in a comprehensive one-stop. This has been changed in the plan to ready “workforce system” to be more inclusive. • Labor exchange services are not limited to adult and dislocated workers;

		⬚ Outreach can be coordinated with all WorkSource partners and business services.	the review team added additional reference under the Business Services Section. Change reflected in plan.
			• There review team clarified that referrals are made among the whole system, not just programs housed in a one-stop (or just outside the one-stop system). Change reflected in plan.
		⬚ Labor Exchange bullet: should not be limited to WIOA A/DW, including recruitment for employers (to be listed under employer services)	
			• The review team recognizes that performance data can be gathered from local and state board, but should also be available at the local area provider level. Changes reflected in plan.
		⬚ Referrals bullet: should not be limited to WIOA A/DW – all partners, including Connection sites	• The review team concurred; however, the review team did not agree that inclusion here was an exclusion of other programs.
			• Review team agreed: Additional bullet added
		⬚ Provision of info on local area performance – this might not be from WIOA A/DW providers, but could come from Local and State Boards.	• Review team included a bullet with public/private training providers. Apprenticeships are addressed in the Title I's answer later in plan (under "B")
		Page 26 – Individualized career services (A and DW): ⬚ Many services listed should not be limited to WIOA , and should include all partners, and at a minimum W-P e.g. group counseling, career planning, workforce prep, financial literacy **Page 26**– follow-up services will look unique depending on the customer.	• Review team included coordination and alignment between Titles I and II, and omitted reference to Start Next Quarter, because it is not universally adopted by the CTCs.
		Page 26– training services (A and DW): ⬚ Missing in "coordination" with training partners/institutions (both public & private & apprenticeships), entrepreneurial services (e.g. SBA), and businesses o ABE- coordination- Another strategy to integrate services is for Adult/DW staff to coordinate with ABE and Colleges through the *Start Next Quarter program.*	
Seattle King County WDC	Operational and Program-Specific	**Alignment with Activities outside the plan (pg 49) (3B)** o Title 1:	

	Components	▢ Under Workforce Education and Local non-profit workforce development activities: a potential strategy for coordination can also include those partners hosting WorkSource Connection Sites, such as housing authorities, food banks, etc. **Page 49** – workforce ed (SBCTC): broaden coordination beyond WRT and Centers of Excellence, such as I-BEST, continuing ed. **Page 50** – public libraries can expand partnership/access; services include workshops, orientation, etc. vs. just electronic accessibility; include the State Library for greater, strategic coordination	• The review team added this suggested language under the subsection on connection sites. • The review team determined that I-BEST in an instruction modality, not a partner program. The plan captures the broadened coordination concept earlier. No change made. • Review team concurred: Comment added to plan
Seattle King County WDC	Operational and Program-Specific Components	**Coordination, Alignment, & Provision of Services to Employers (3)(D) (pg 75)** o Title 1: As was added to the Strategic Plan, please include" information sharing among businesses and WorkSource partners" in the description of business services.	The review team did considerable rewrite of the opening paragraphs to reflect the role of the local workforce development councils as the lead role in business engagement.
Vy Nguyen, One America	Analysis and Assessment of Adult Education Needs	In adult education, Washington lacks the data and analysis to understand how to best target allocation of resources and develop programs. We recommend the Workforce Board conduct a scan of adult education needs of target populations in multiple languages and data collection formats to gain a clear picture of who potential and existing clients are, their workforce development needs, the supports they need to remain engaged in workforce development and adult education, and how educational and training pathways can be tailored to meet the needs of current and future clients. With additional data, we can build a workforce and adult education system that knows how to target priority of service, allocate resources to areas and populations with high need, and meets the needs of our workforce in an equitable way. Adult populations that need to be assessed include adults who: o have less than a high school degree or equivalent; o have very low levels of education and/or basic skills; o are limited English proficiency (LEP); o are low-educated and/or LEP parents of young children; o foreign-born individuals who have not attained U.S. citizenship; and/or o foreign-born, college-educated (or higher) individuals who obtained	Review team carefully considered all of this commentator's thoughtful input. Much is beyond the scope of this plan. Workforce Board staff will correspond to this commentator to address all of One America's suggestions.

		their education abroad. The needs assessment should be used to guide strategic planning for adult learning, determine program offerings, and establish a baseline to measure effectiveness of serving populations most in need of services.	
Vy Nguyen, One America	Priority of Service	Given the diversity of Washington State's foreign-born in educational attainment, home language or English language proficiency, and digital literacy; it is crucial that workforce development services and American Job Centers tailor educational opportunities and workforce services according to what is needed by each population group. Washington State must describe how these populations will be identified and provided services for which they are eligible, as required by WIOA. To ensure that the federal mandate of priority of services under WIOA is met, combined plans must detail in clear language how services for those most in need of services will be implemented. Many workforce and adult education programs target limited English proficiency, low-income, or low-educated individuals; immigrant and refugee populations meet all three of these program areas at a high rate. Services must anticipate the complex needs and challenges of clients through detailed data analysis, set high accountability expectations to local WIBs that priority of services are fulfilled, and find ways to reach high need clients for optimal outcomes under the new workforce system. To execute priority of service in an equitable way, we urge the Workforce Board to conduct data collection and assessment of client needs that will support tailored programs and services, and strengthen outreach to target communities, including engagement with community-based organizations (detailed later).	Review team concurred: Language added to Page 98 (Operational Components): Provide a system for recognizing prior learning credit (i.e., for competencies, military training experiences, foreign degrees or certifications, and skills) gained from professional development and continuing education courses.
Vy Nguyen, One America	Prioritized Funding and Federal Fund Matching	With strengthened data sets around adult education needs, we urge the Workforce Board to allocate state resources to Title funding where they are most needed. This can be accomplished through conducting a racial equity analysis of Title funding and their impact in immigrant and refugee communities. If the analysis indicates areas where greater impact can be had in certain program areas over others, we ask the Workforce Board to prioritize funding into these areas, even if this means a minimal match – rather than excess – of federal funding.	Review team carefully considered all of this commentator's thoughtful input. Much is beyond the scope of this plan. Workforce Board staff will correspond to this commentator to address all of One America's suggestions.

		We ask the Workforce Board to commit funding to Adult Education and Literacy programs in full; these are essential programs in communities all across the state that improve family literacy and citizenship preparation for Washington's new Americans. It is important to remember that individuals accessing AEFLA services may not be seeking college degrees but instead enroll in programs to deepen their integration into their local communities. Prioritized funding for Adult Education and Literacy programs, especially contextualized ELA settings, meet many of WIOA's goals through helping individuals improve their English proficiency, increase economic self-sufficiency, and ensure access to education essential for individuals to become naturalized citizens, active members of their communities, or simply parents who want to support their child's education and learning. Improving outcomes for individuals must also recognize learning outcomes that promotes civic engagement and family literacy as a way to strengthen our communities.	
Vy Nguyen, One America	Working with Community-based Organizations (CBOs)	CBOs can and should play a central role connecting clients to workforce development services and educational opportunities outlined in the strategic plan. Given that many CBOs lack capacity or resources, we recommend that the Workforce Board makes efforts to contract with community-based organizations to support authentic outreach and engagement efforts focusing on target populations and communities with significant workforce development needs. Partnerships through local and regional WIBs or American Jobs Centers with CBOs, who have long-standing relationships and trust with target populations, will strengthen the workforce development system's knowledge about the services and supports clients need to find success in the new workforce system through data collection and story sharing in a safe, trusted space with clients. Additionally, supporting the capacity of CBOs to serve high priority populations, such as immigrants and refugees, through ELA services is an important foundational step for high priority populations. Building CBO capacity will help students transition to workforce development and adult education services once students achieve sufficient English proficiency.	Review team carefully considered all of this commentator's thoughtful input. Much is beyond the scope of this plan. Workforce Board staff will correspond to this commentator to address all of One America's suggestions.
Vy Nguyen,	Equitable Access	The new workforce strategic plan can be an effective tool to address	Review team carefully considered all of this commentator's thoughtful input.

| One America | | inequities and disparities for those pursuing living wage careers. To ensure a system that will generate prosperity for all and improve client outcomes, we urge the Workforce Board to include provisions and procedures that center racial equity in workforce and adult education policies and programs. A workforce system with equity at the forefront of planning and implementation will advance our economy while eradicating some of the historic barriers obstructing potential clients from the services they need. Here are some additional considerations:

o **Technology & Digital literacy:** Technology has been an effective tool in increasing the reach of programs but it also has significant limitations. Depending on technology as a way to increase access becomes a barrier in itself if information, websites, and services are not translated into languages and formats utilized by clients. Technology also imposes the requirement of digital literacy, which disproportionately impacts individuals who have not gained necessary computer skills and/or are limited English proficiency. Ensuring clients have equitable opportunities to gain digital literacy will increase their employability and access to living-wage jobs.

o **Spectrum of services and programs:** Among Washington residents over the age of 25, 16 percent are foreign-born. But among Washington residents over the age of 25, 43 percent lack a high school degree or equivalent. At the same time, 31 percent of foreign-born adults over the age of 25 residing in Washington State hold a bachelor's degree or higher. Each end of this education spectrum needs different services to succeed, which indicates a clear need for a spectrum of services that will optimize skills and potential for all individuals; services must utilize Title I and Title II funds targeted in equitable ways to meet their needs.

o **Customer Support: Career Navigators/Counselors:** It is vital for individuals accessing workforce and adult literacy programs to have career navigators/counselors with whom they can identify and connect with. American Job Centers must have translated materials relevant to the local communities they serve, and should make efforts to hire navigators and counselors that come from the community being served to enhance cultural competency and linguistic responsiveness with clients. | Much is beyond the scope of this plan.
Workforce Board staff will correspond to this commentator to address all of One America's suggestions. |

		o **Community Advisory:** Implementing a community advisory committee, comprised of stakeholders, youth, and clients, will ensure community voice in shaping an equitable system and implementation while creating space for the Workforce Board, local WIBs, and communities to engage in regular conversation about barriers, issues, concerns, and challenges as the new workforce system is implemented. A community advisory committee can be instrumental to support engagement with difficult to reach communities, build social capital, and help communities gain knowledge of workforce development services.	
Vy Nguyen, One America	Brain Waste	Immigrants and refugees constitute 16 percent of Washington State's college educated population, yet 23 percent of foreign-born adults who received their degrees abroad often lack the necessary support and services to help them navigate regulatory, financial, and cultural barriers to bring their expertise and skills into our workforce. At a time when Washington's economy is becoming increasingly professionalized, where a college degree is often a requirement to enter a particular sector, more employers and sectors are reporting a skills gap yet Washington's degree production cannot keep pace with demand. Nursing and teaching, for example, are among sectors that report a skills gap. By identifying ways within the new workforce system to help educated individuals back into their chosen professions, an untapped talent pool can be brought into the workforce where Washington's economy and consumers will benefit from an infusion of expertise, cultural competencies, and world languages. (To learn more about the issue of brain waste, read here: http://bit.ly/WA_brainwaste) Some early measures the Workforce Board can take to address brain waste in the new workforce development system include: o strengthen data collection at community colleges or other adult education settings at the time of enrollment to help assess the size and scope of brain waste; o direct state licensing boards to assess whether their licensing requirements pose unintentional barriers for applicants, create guides to help applicants navigate the credential process, and provide translated materials;	Review team carefully considered these comments. The following paragraph of the plan identifies some of the efforts that are being made in response to this issue: *Puget Sound Welcome Back Center* *builds bridges between the pool of internationally trained professionals living in Washington and the need for linguistically and culturally competent professional services. Its goal is to assist these professionals to make the best use of their professional skills through respectful, innovative, and individualized career counseling, and educational services.*

		o explore scholarship or loan programs for foreign-educated professionals to access and utilize towards financial costs associated with pursuing career re-entry, such as professional knowledge exams, supplemental courses, or even childcare. Washington State is becoming increasingly diverse. In 1990, our foreign-born population was 6.6 percent of total population, a number that has more than doubled to 16 percent in 2015.iii Most of Washington's foreign-born residents are in their prime working age years, with 70% falling between the age bands of 25-44 and 45-59 years in age (compared to 59% for the native born population).iv Ensuring equitable access for immigrants and refugees is essential to keeping Washington's workforce and communities vibrant and to help more individuals pursue fulfilling careers that pay a living wage. Immigrants and refugees are a vital part of the social and economic fabric of Washington communities, yet many face challenges and barriers in their efforts for full economic integration due to gaps in infrastructure and/or a lack of culturally responsive supports in the workforce system and adult education. We, the undersigned organizations, welcome the Workforce Board to engage with us in further dialogue and collaboration to discuss ways to shape a workforce system that has authentic connections with immigrant and refugee populations and recognizes the assets and strengths foreign-born communities bring to our state, workforce, and economy. We urge you to ensure the usage of asset-based language in designing systems and strategies to serve immigrants and refugees, bolster equitable access for this underserved population, and better recognize the diversity and unique challenges within immigrant and refugee communities. By incorporating these principles into Washington's 10 year strategic plan, the Workforce Board will demonstrate that it recognizes the talent of all Washington residents and build shared prosperity for all.	
Workforce Education Council	Educational Strategies	Open Educational Resources (OER) and eLearning are separate initiatives and should be addressed separately in the plan. OER are	The review team concurred. Change was made to separate these two initiatives as requested.

		openly licensed educational materials (e.g., textbooks, videos, or info-graphics) used to share knowledge and can be used regardless of the mode of delivery. ELearning is a broader concept describing a mode of teaching and learning. Both of these educational innovations hold potential to positively impact workforce development programs, but their support and funding should not be co-mingled. (Strategic Section 44-45)	
Workforce Education Council	Educational Strategies	WEC supports the language that industry credentials SHOULD be integrated for credit where possible, but allowing for flexibility and stopping short of mandatory language. Colleges are working diligently to implement simultaneous awarding of credit and an industry credential where possible. However, at times this is not feasible due to restrictions (e.g., age minimums, experience requirements, access to testing) and costs of third party credentialing agencies. (Strategic Section 21)	Review team agreed with commenter, but the statement in the plan is not a mandate and allows for flexibility.
Workforce Education Council	Educational Strategies	The goal of increasing work-based learning opportunities does not sufficiently address the potential barriers for employers and students. For example, some enterprises may need direct funds to offset lost productivity from a trainee, while others may face direct costs for safety equipment or insurance. The plan should consider mechanisms to allow for optimizing the flexibility of these funds to be able to overcome the barriers to work-based learning on an employer-by-employer basis. (Operational Section 420-424)	The review team agrees conceptually, and anticipates that this will be reflected in the local plans. Also, other programs referenced in the plan are designed to serve people with barriers to employment (see VR and OJT). We agree that funding flexibility sometimes inhibits outreach to businesses and will continue to seek flexibility where we can.
Workforce Education Council	Career Pathways and Sector Strategies	State and Local workforce agencies should honor the work completed by the Washington Career Pathways (WACAPA) initiative at Pierce College. The community and technical college system through its campuses and Centers of Excellence should lead the development and mapping of quality career pathways to best serve participants across all elements of WIOA. (Operational Section 15-16) Added paragraph in same section: Career pathway development has been a recent focus for Washington's workforce system stakeholders. With WIOA's specific focus on career pathway development and alignment, we will seek to identify and encourage successful efforts already underway statewide, including the	Review team agreed: suggested paragraph added. • Review team concurs; paragraph added to page 18.

		Washington Career Pathways (WACAPA) initiative at Pierce College. The community and technical college system in Washington and its campuses and Centers of Excellence have been leaders in the development and mapping of quality career pathways. We will work with them to apply the same concepts in ways that best serve participants across all elements of WIOA.	
Workforce Education Council	Career Pathways and Sector Strategies	WEC STRONGLY supports the use of sector strategies throughout the workforce system as a mechanism to better serve students and employers. The community and technical colleges' Centers of Excellence are uniquely poised to assist local councils across the state in leveraging specific sector strategies (Strategic Priority III)	Review team did not find this comment required any changes to the language of the plan.
Workforce Education Council	Metrics and Outcomes	The state and local plans must contain realistic and achievable goals. WIOA shifts the focus of workforce efforts to serve those with the greatest barriers. With this focus, we cannot assume the same level of client success in the short term as under WIA. As local area plans and metrics are created, this shift in prioritization must be incorporated in those metrics and benchmarks. (In general Strategic Plan Phase V)	The review team concurred. The state is awaiting final rules.
Workforce Education Council	Metrics and Outcomes	Local Workforce Board and colleges seem to be working with the same employers (particularly large employers),; how do we broaden the base of employers in the system? The plan should specifically identify non-connected businesses and implement metrics to target those businesses to bring into the workforce system. The metrics should also take into consideration businesses that have valid reasons for choosing not to engage with the workforce system (such as low or no hiring activity), and partners should not be penalized in those instances. (Accenture report as referenced in the Strategic section)	Reviewers agreed that identifying non-connected businesses would be useful, but we lack sufficient data to identify individual businesses. Moreover, we are awaiting additional federal guidance on business engagement metrics.
Workforce Education Council	Structure and Governance	WEC recommends deferral until 2017 for WIOA MOUs and shared funding between the colleges and local WDCs in accordance with the US Departments of Education Guidance. The delays in the planning process leaves too many uncertainties, best to wait until 2017 to create MOUs that are effective and lasting. For the community colleges, local area planning will occur AFTER grant applications for Title II funds are due, meaning colleges will have to determine their commitment before this collaborative planning takes place. In 2017, these plans will be in place prior to grant application and award allowing for the planned and	Reviewers agreed. DOL and ED have recently issued guidance to the effect that MOUs would not be monitored until July 2017, mooting the commenter's request to delay implementation and monitoring by a year.

		proper allocation of funds. (Referencing OCTAE guidance)	
Workforce Education Council	Structure and Governance	WEC believes it is critical for an ABE/ESL college representative to serve on the local WDC Boards and not merely through committee representation. Given the diverse organizational structures at the college level, flexibility should be given to local areas to meet this requirements (In general, Title II)	Review team did not weigh in on a preferred composition of local boards, and considered the actual composition and makeup of local boards to be beyond the scope of the state plan.
Workforce Education Council	Structure and Governance	Community and Technical Colleges are primary stakeholders in WIOA and should receive priority consideration for training dollars. When Community and Technical Colleges provide training to workforce participants there are greater chances for participants to earn college credits. Using the colleges leverages state investments in facilities, equipment, and a highly trained faculty. While we recognize the value that Community Based Organizations bring to the table, as contributors to the infrastructure of the workforce delivery system, colleges should be the first option for these limited funds. (Operational Section 88-89)	Comment not accepted. Review team felt that while CTCs are indeed a critical, core partner in workforce development, presumptive prioritization of CTCs over CBOs did not reflect a system-wide consensus.
Workforce Education Council	Metrics and Outcomes	The Business Engagement Sections in the Strategic and Operational sections have four and six goals respectively. The two sections should have the same overall goals in order to move all partners towards achieving desired outcomes (Strategic Section Priority ii)	Review team accepted change and synced up the goals. These goals were also modified pursuant comments received from Seattle-King County WDC that requested a lower year-over-year percent improvement in business engagement and questioned the setting of a baseline for business engagement. All references to business engagement goals are now identical in all parts of the plan.
Workforce Education Council	Metrics and Outcomes	The Operational section does not contain details on how to create baseline measurements for various elements including employer satisfaction and utilization of the workforce system. We have concerns about who is keeping count of the utilization statistics, and how those metrics will be tracked and reported (specifically, the current lack of any mechanism for tracking employer engagement across the entire workforce system.). (Operational section 75 and referenced throughout)	Review team concurs with the commenter's concern about the lack of employer satisfaction and utilization elements. We await federal guidance that may be informative, but have also modified Business Engagement goals to prioritize the creation of meaningful metrics to establish baselines.