

<b>State of Oregon</b> Governor's Office of Education and Workforce Policy Salem, Oregon 97310	Classification:
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## Oregon Workforce Letter No. 8

TO: ALL LOCAL AND REGIONAL WORKFORCE BOARDS  
 ALL STATEWIDE ACTION TEAM MEMBERS  
 ALL STATE WORKFORCE AGENCIES  
 ALL LOCAL WORKFORCE PROVIDERS

FROM: Annette Talbott, Governor's Workforce Policy Coordinator

SUBJECT: Local Unified Plan Modifications Guidance

1. Purpose. The purpose of this letter is to implement guidance pertaining to modifications of Local Unified Workforce Plans.
2. References. Local Unified Workforce Plan Guidance (Revised January 14, 2000). This document is posted on the state's workforce website at <http://www.workforce.state.or.us/workforce/stateboard/state/stateplan.htm>. Click on Local Unified Workforce [Plan] Guidance (Full Version).
3. Definitions.
  - a) Major modification. A major modification is one that is required due to the following circumstances which are illustrative but not all-inclusive: significant changes in local economic conditions, the labor market, the financing available to support local workforce goals and strategies, program design and strategies, changes to the originally approved Local Board Structure, or a need to revise strategies to meet performance goals.
  - b) Minor modification. A minor modification is an adjustment to the Plan that is not "significant" as in a major modification.
  - c) Partners. As outlined in the Local Unified Workforce Plan Guidance state agencies listed below and the funding streams they administer at the State, Local and Regional levels are required to participate in the Local Unified Plans. It is expected that this list will grow over time. These funding streams, agencies, or organizations do not limit local planning efforts. In fact, it is expected that other one-stop partners, both mandatory and optional, will participate in local planning and will be incorporated into local plans. The funding streams by state agency are:
    - ✓ Department of Community Colleges and Workforce Development (CCWD)
      - WIA Title IB

- WIA Title II (Adult Education and Family Literacy Act)
- ✓ Employment Department (OED)
  - WIA Title III (Wagner Peyser including Migrant and Seasonal Farmworker)
  - Veterans
  - UI
  - TAA/NAFTA
- ✓ Department of Education (ODE)
  - Carl Perkins (Post-Secondary)
- ✓ Department of Human Services
  - TANF
  - Food Stamps Employment and Training Program
  - Welfare to Work
  - WIA Title IV (Vocational Rehabilitation Act)
  - Title V (Older Americans Act)

Recognizing that the unified plans of regional workforce partners within the Federal designated Local Workforce Area roll-up to the Local Area Unified Plan; the regional workforce partners are also expected to follow the guidance outlined in this letter.

- d) Program Implementation Team. State-level cross agency team that may include local representation on an as needed basis to address programmatic questions and issues presented by the one-stop system/WIA implementation in Oregon.

4. Background. As originally envisioned, the Local Unified Workforce Plan was comprised of two sections – the Strategic Plan and the Partners’ Plan Requirements (funding stream plans). This approach to the organization of the plan was to “assure the acceptance of the unified plan by the involved state agencies and funding sources” and to bring local and regional partners into the planning process, to “be at the table, participating in the strategic discussion that will more closely align the workforce programs of the various agencies and funding streams.”

As the plans from the Local Areas were reviewed, approved and distributed, it became clear that maintaining this dual emphasis would overshadow the more important strategic planning approach. A more streamlined approach will make the unified planning approach more workable.

5. Guidance. This letter informs partners of the expectations pertaining to modifications of the Local Unified Workforce Plans.

- a) To assure the integrity of the Local Unified Workforce Plans, emphasis will be placed on the maintenance (including modifications) of the Strategic Plans (Section 2) as a jointly shared responsibility of the partners at all levels.
- b) Oversight and maintenance (including modifications) of the Partners’ Plan Requirements (Section 3 - funding stream plans) is the responsibility of the individual agencies administering those plans/grants.
- c) Modifications to the Strategic Plan might arise either because of the need to modify an individual funding stream plan or because of a need to change the Strategic Plan in and of

itself, apart from its relationship to the partners' funding stream plans. Modifications might also arise as a part of established Local/State processes or on an as needed basis.

- d) The impact of the anticipated change(s) on the Strategic Plan might be either of a major or minor nature. If the impact on the Strategic Plan is determined to be a major modification, then requirements under item "i" below for Public Notice will apply.
- e) Determination of whether a modification is major or minor shall be based on the definition provided in this guidance and the agreement of the Local/regional partners. A State determination on whether a modification is major or minor will occur when the local/regional partners are unable to agree. Requests for State determination shall be submitted to the Office of Education and Workforce Policy and reviewed by the state-level Program Implementation Team (PIT).
- f) Local partners will develop and use processes for sharing information with each other about modifications to their individual funding stream plans. These processes are locally determined but must assure the involvement of the Local partners in the deliberations of the impact of modifications on the Local Strategic Plan. A Local Area with multiple regions shall assure similar processes exist within its regions.
- g) Local partners will jointly determine whether modifications to their individual funding stream plans require a modification to the Local Unified Workforce Strategic Plan
- h) Processes shall be developed and used at both the local and state levels to review and approve major modifications to the Local Strategic Plan. A Local Area with multiple regions shall assure similar processes exist within its regions.
  - (i) Major modifications to the Local Strategic Plan must be reviewed and approved at the local level through the Local Workforce Investment Boards and, as applicable, at the regional level through the regional level boards. Review and opportunity for comment by all Local partners is emphasized.
  - (ii) Major modifications to the Local Strategic Plan will receive technical review by the state-level PIT and forwarded to the Oregon Workforce Investment Board (OWIB) for disposition/approval. Local partners are encouraged to discuss anticipated modifications with their funding stream administrators and/or the PIT prior to submitting their modifications for final action. Doing so could assure helpful input and avoid unwanted delays in moving the modification forward.
- i) Public Notice requirements (Public Review of Local Unified Plans) outlined in the Local Unified Plan Guidelines issued January 14, 2000 and attached to this letter shall be followed for major modifications. A Local Area with multiple regions shall assure compliance with Public Notice requirements within its regions.

6. Implementation. Immediate.

7. Action Required. State and local partners will implement the necessary procedures and structures to address the guidance contained in this letter.

8. Inquiries. Contact Annette Talbott, Governor's Workforce Policy Coordinator, at 503-378-3921, x24 or Jana M. Hofer, Workforce Investment Act Liaison, at 503-378-8646, x227.

Attachments

A Public Review of Local Unified Plans

## ATTACHMENT A

### **INTRODUCTION - GENERAL INFORMATION - PUBLIC REVIEW OF LOCAL UNIFIED PLANS**

Local Unified Plans are to receive public review and comment prior to submission. Review and comment procedures are to comply at a minimum with requirements at Section 118(c) of the Workforce Investment Act and its implementing regulations at 20 CFR 661.345. Other funding sources included in the Local Unified Plan may require additional review and comment steps to be taken. The Local Unified Plan must be made available to the general public and appropriate agencies and organizations through such means as public hearings and local news media.

Partners are responsible for the following actions:

1. Maintain documentation that Local Unified Plans were made available for review and comment by members of the local Workforce Investment Board, members of the public, including representatives of business and representatives of labor organizations, appropriate local education agencies, other public agencies in the local area.
2. Allow comments to be submitted on the proposed local plan not later than the end of the 30 day period beginning on the date on which the proposed local plan is made available;
3. Include with the Local Unified Plan submitted to the Governor any such comments that represent disagreement with the plan.
4. Maintain documentation of the public meeting where the plan was approved. The minutes must specifically state any public comments received and the response to the comment(s).

### **ATTORNEY GENERAL'S MANUAL ON PUBLIC MEETINGS**

The requirements outlined under the Attorney General's manual on Public Records and Meetings Manual must be followed for public meetings where the Local Unified Plans are considered. Every two years, following adjournment of regular legislative sessions, the Attorney General updates and publishes a Public Records and Meetings Manual. The manual is intended to provide assistance to state agencies, local governments and to the public generally. Copies of the manual may be purchased from:

Department of Justice  
100 Justice Building  
1162 Court Street NE  
Salem, OR 97310

For current price, call: (503) 378-2992, ext. 325. TTY: (503) 378-5938. Access current information on <http://www.doj.state.or.us/pros/mli.htm>.