

Public Comment Received for the Oregon WIOA Combined State Plan

<u>No.</u>	<u>Question/Comment</u>	<u>Source</u>	<u>Reference</u>	<u>Answer/Response</u>
1	Glad to see it's a combined plan. The need to plan across core programs is essential AND needs to be state-level and local areas working together, which is minimal, at best.	Oregon Workforce Partnership	Part I. WIOA State Plan Type and Introduction, (a) Unified or Combined State Plan [page 7-8]	<p>(HECC OWI) Oregon has a strong commitment to and a long history of planning and alignment among an expanding number of partners. Oregon's 2016-2019 Unified State Plan described aligned strategies and programs with TANF and SNAP employment and training programs despite their not being included as a formal partner to the Unified Plan. Similarly, Oregon's 2020-2023 Combined State Plan reflects alignment with partners, programs, and strategies despite their not being included formally as a part of the Combined Plan.</p> <p>Please see also the Answer/Response to Question/Comment 2.</p>
2A	<p>As indicated on page 7, several key programs including Carl D. Perkins, Unemployment Insurance (UI) and Jobs for Veterans were excluded. Why? The exclusion of unemployment is particularly concerning given that WorkSource Oregon (WSO) is the primary delivery mechanism used to help people transition from unemployment to employment. The new Reemployment Services and Eligibility Assessment grant (RESEA) is transitioning to a formula funded program in FY 2021 and the resources are growing dramatically.</p> <p>One of the primary goals of RESEA is to promote alignment with the broader vision of the Workforce Innovation and Opportunity Act (WIOA) system. The changes make RESEA permanent, more flexible, and a mandatory one-stop partner under WIOA. This presents enormous opportunities to shore up Oregon's workforce development system and should be included in State and local WIOA plans.</p>	Worksystems	Part I. WIOA State Plan Type and Introduction, (a) Unified or Combined State Plan [page 7-8]	<p>(OED) The Unemployment Insurance program, although not included in the plan, is a key partner in the delivery of WIOA services. To ensure coordination of services between OED, the one-stop centers and WIOA partners, OED established (several years ago) the "Workforce Operations-Unemployment Insurance Connectivity" team. This team is charged with improving communications between divisions, identity training needs for staff, and otherwise ensuring claimants are receiving appropriate reemployment services. Please know that effective this year, the state is required to submit an annual RESEA state plan. This plan details how OED will administer the RESEA program and provide reemployment services to UI claimants.</p> <p>The Jobs for Veterans State Grants (JVSG) program traditionally submits a Stand-Alone JVSG State Plan to the U.S. Department of Labor – VETS (USDOL-VETS), and is not formally part of the 2020-2023 WIOA Combined State Plan for the State of Oregon. The JVSG staff are integrated into the WorkSource Centers service delivery model to serve targeted populations with significant barriers to employment, and to promote hiring of veterans through business services. The Stand-Alone JVSG State Plan 2020-2023 meets the requirements under the Workforce Innovation and Opportunity Act (OMB Control Number 1205-0522). Additionally, USDOL-VETS provided a Grant Officer Memorandum 01-20 (dated March 4, 2020) outlining the JVSG State Plan submission process under the WIOA. This memorandum provides JVSG recipients with guidance for submission of the JVSG State Plans for Program Years (PY) 2020–2023, including the process, deadline, and instructions for certain items.</p>

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2B				<p>(CCWD) While career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) are not formally part of the 2020-23 WIOA Combined State Plan for the State of Oregon, there was significant partnership and alignment nonetheless. The 2020-2024 Oregon CTE State Plan and the Oregon WIOA Combined State Plan were developed on parallel time tables. Staff integral to each plan were involved in the development of the other plan and a significant theme of and priority for work-based learning appears in both plans. A growing connection between CTE education (K-12 and post-secondary) and the workforce system is expected over the life of both state plans.</p>
3	Why were UI and Vets left out of the planning?	Oregon Workforce Partnership	Part I. WIOA State Plan Type and Introduction, (a) Unified or Combined State Plan [page 7-8]	Please see Answer/Response to Question/Comment 2.
4	If 104,000 people's jobs will be impacted by Autonomous Vehicles (AV) cited on (Page 18), what are the plans to mitigate despair? Cutting funds for workforce training programs is the wrong approach and yet that is what is happening.	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (1) Economic and Workforce Analysis, (B) Workforce Analysis [page 18-19]	<p>(WTDB) The Workforce and Talent Development Board (WTDB) understands the critical nature of these issues and is focused on the impact and opportunity of automation and artificial intelligence. The WTDB has launched the Artificial Intelligence (AI) Taskforce. The AI Taskforce is developing a comprehensive report including an analysis of available data, societal and industry sector-based impacts and opportunities, and educational needs in the K-12 and post-secondary systems. Recommendations will be forwarded to the Governor in September.</p> <p>(OED) ?</p>
5	We appreciate the effort to focus on "True Wages" (p. 22) and look forward to partnering with the WTDB to develop tools and resources to help workers, businesses and policy makers understand what it takes to achieve self-sufficiency in Oregon.	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (1) Economic and Workforce Analysis, (B) Workforce Analysis [page 22-23]	<p>(WTDB) The Workforce and Talent Development Board's (WTDB's) vision is equitable prosperity for all Oregonians. The concepts of "true wage" and self-sufficiency are key to realizing this vision. The WTDB expects that much work will continue in this area including investments in pilot programs, funding an update of the Self-Sufficiency Report for Oregon, supporting and potentially expanding the capability of the Prosperity Planner tool, and other initiatives. The WTDB anticipates and looks forward to broad and inclusive partnerships to address these issues.</p>

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6	<p>Lack of child care is one reason Labor Force Participation rate has been stagnant. (Page 29 - Over the last 20 years, labor force participation rates have been falling in Oregon and the U.S. as a larger share of the population reaches retirement age and fewer young people enter the labor force.) This needs to be explicit.</p>	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (1) Economic and Workforce Analysis, (B) Workforce Analysis [page 29]	<p>(OED) The effect of child care availability on labor force participation rates remains unknown, but would not change the overall trend of reduced participation since 2000. Overall labor force participation rates have fallen over the past twenty years in both the United States and Oregon, as the population has aged and young people have joined the labor force less frequently than in the past. The participation rate for young people ages 16 to 24 dropped more than 13 percentage points between 2000 and 2018. As the older population has grown, labor force participation among those ages 55 and older has actually increased a few percentage points to 36 percent in 2018; however, as the labor force participation rate for those 55 and older is very low compared with the prime working age group (those ages 25 to 54), their increased presence hasn't made up for reduced participation among youth. For those outside the labor force, most give retirement as the reason they are not looking for work and that number has grown significantly in the past decade. Labor force participation among the prime working age group declined by about 3 percentage points since 2000. Child care availability and affordability may be restricting the labor market choices of some parents in this age group and to some extent in the 16 to 24 group. It's quite possible increased access to child care could boost labor force participation rates, but we don't know how much. Encouraging earlier and more frequent labor force participation among youth would also help prop up the participation rate, and ensure young people are getting the experience they need to be successful in the labor market over their careers.</p>
7	<p>On Page 33 on "Skills Mismatches, Shortages and Gaps" #3 mentions "Employers signal a high demand for engineers, skilled tradespeople, and project managers. While industries have specific employment needs, there are occupational needs that exist across sectors. The most frequently cited occupations across industries include engineers, skilled trades, and project managers."</p> <p>Based on this projection and on the fact that this employer demand for these types of skills across all sectors, I'd like to see the Plan assist with strategies and potentially funding to help LWIBs and Higher Education attract and train people with these specific high demand cross sector skills – engineers and project managers (beyond skilled trades which is already in our wheel house).</p>	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (1) Economic and Workforce Analysis, (B) Workforce Analysis [page 33-34]	<p>(WTDB) Local Workforce Development Boards are responsible for industry sector strategies led by business and working closely with post-secondary education institutions and other training providers as appropriate. The Higher Education Coordinating Commission Office of Workforce Investments (HECC OWI) provides state General Fund dollars to support these efforts. However, the available funds do not currently meet the need. HECC OWI is in the process of developing policy and budget recommendations for the 2021-23 biennium to address funding for training in occupations and for skills that are in demand based on local priorities established through industry sector partnerships.</p>

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8	<p>Page 34 it states ‘The conclusion: the labor market has been rewarding humans for performing tasks that computers cannot do.’ This is if not wholly, partially, untrue as wages have not seen any significant increase. And what about child care, home care -- female dominated industries making less than living wages. These occupations are as human as it gets – and they are not being rewarded with living wages and competitive benefits.</p> <p>Also, Page 34 #6 – How sad is it when we see the economic gains not being shared with the people doing the work.</p>	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (1) Economic and Workforce Analysis, (B) Workforce Analysis [page 34-35]	(HECC OWI) The reference in this paragraph to “rewards” is more about occupations that are growing or shrinking and not wages. From the 2018 Oregon Talent Assessment, the labor market over the last three decades has “rewarded” or grown occupations that have human elements and shrank occupations that were more routine or repetitive and subject to automation. The “reward” reference, in this instance, does not pertain to wages. Wage issues related to growing polarization, gender equity, and self-sufficiency (especially for low wage jobs with high social good) continue to be important to the Workforce and Talent Development Board (WTDB) and will be championed by work that continues from the WTDB’s True Wage Taskforce.
9	The WorkSource Oregon Standards (WSO) (p. 37) need to be updated to reflect programmatic and service delivery changes. A committee consisting of State and local investors in WSO should be established to update the Standard and establish a mechanism for ongoing review and evaluation.	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (A) The State's Workforce Development Activities [page 37]	(HECC OWI) The Higher Education Coordinating Commission Office of Workforce Investments (HECC-OWI) is responsible for coordinating this effort. HECC OWI is aware of the need to update the WorkSource Oregon Operational Standards and expects work will begin in 2020. We plan to contract with third party consultant to facilitate development of the WSO Operational Standards.
10	RESEA offers considerable flexibility and encourages innovation in delivering services to UI claimants. How will the services outlined on page 39 evolve to incorporate the changes and opportunities available through RESEA?	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (A) The State's Workforce Development Activities [page 39]	(OED) It’s difficult to say at this point in time how the RESEA program will evolve over the next four years, though we know it will. However, we have the opportunity (and requirement) to submit an RESEA state plan each calendar year and changes or evolutions in the program will be more fully explored and explained in that document.
11	The Oregon Employment Department is generating significant resources through the SNAP 50/50 program (p. 40). How are these resources being reinvested into the system and coordinated with priorities identified in local workforce plans? How do local areas inform the reinvestment of these resources to support shared customers and the alignment of all available resources?	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (A) The State's Workforce Development Activities [page 40]	(DHS) SNAP 50/50 is a matching funds program, where DHS reimburses contracted partners for half of allowable expenses to run their programs. The reimbursements are paid to the partners quarterly and once the funds are transferred they belong to the partner. The funds are mainly used to pay for programmatic costs, but any funds not used for this purpose are reinvested by the specific partner. Most partners use any remaining funds to reinvest in their SNAP 50/50 programs to be able to expand services the following year. Partners focus retraining and placement efforts based on sector strategies defined by the local workforce area. DHS Districts also have SNAP 50/50 Steering Committees to collaborate with partners, encouraging referrals among them and coordination of services. DHS works with workforce boards and the Oregon Employment Department to ensure that strategies are nimble and match the economic and industry needs of the local areas.

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12	Since SNAP 50/50 is called out as a resource to the workforce system, Local Workforce Boards should know these numbers and where these funds go/how they're reinvested.	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (A) The State's Workforce Development Activities [page 40]	(DHS) Local DHS Leadership attends the workforce board meetings and collaborates with boards on sector strategies and local economic and industry needs. Many workforce boards are SNAP 50/50 partners and belong to DHS District SNAP 50/50 Steering Committees. Workforce boards are always welcome to reach out to DHS District Leadership or DHS Central Office if they have questions about funding or how funding beyond the program reimbursements is allocated by partners.
13	The WorkSource Oregon Standards need to be updated and a process developed to continually update the standards to reflect program and resource changes (p.42).	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (B) The Strengths and Weaknesses of Workforce Development Activities [page 42]	Please see Answer/Response to Question/Comment 9.
14	We applaud OED's efforts and focus on serving SNAP recipients through the WSO system. However, the scale of OED's program is beginning to impact partners and services both at the Centers and in implementing non-OED based SNAP programs. More work needs to be done to align these efforts, coordinate services and ensure a coordinated approach to serving shared customers (pgs. 42-43).	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (B) The Strengths and Weaknesses of Workforce Development Activities [page 42-43]	(DHS) The Oregon Employment Department is a statewide SNAP 50/50 provider, and also the statewide ABAWD provider. OED is allocated funding by DHS to operate the ABAWD program and also receives the 50 percent reimbursements for their SNAP 50/50 program, like other SNAP 50/50 providers. DHS Districts have SNAP 50/50 Steering Committees to help providers collaborate and build referral processes. Committees also help providers to understand which program components and support services are offered by the local providers so that they can make appropriate referrals to each other. DHS Central Office policy analysts are available to providers to help them expand programs.
15	Why are Career and Technical Education (CTE) programs not part of the combined plan? The draft CTE plan focus on work-based learning could greatly benefit from coordination with other work-based programs, youth employment efforts, and local sector strategy connections (p.43).	Worksystems	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (B) The Strengths and Weaknesses of Workforce Development Activities [page 43]	Please see Answer/Response to Question/Comment 2.

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16	The Weaknesses section is light. I would like to see the State acknowledge real concerns from the field (in real time data sharing? Delayed communication? Procurement and contracting always being late? Insufficient support services?)	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (B) The Strengths and Weaknesses of Workforce Development Activities [page 43]	(HECC OWI) The need for additional narrative will be evaluated in an anticipated WIOA Combined State Plan modification due to the COVID-19 emergency.
17	Great callout (below) and yet LWB's don't have all of the information about how much is invested locally across the system. It's hard to coordinate if you can't see the whole picture. (The LWDBs, as neutral independent brokers of workforce services, purchase contracted workforce services that are provided through the WSO centers to support talent development, job creation, income progression, business competitiveness, and expanded opportunities for citizen prosperity. The LWDBs certify WorkSource Oregon centers.)	Oregon Workforce Partnership	Part II. Strategic Elements, (a) Economic, Workforce, and Workforce Development Activities Analysis, (2) Workforce Development, Education, and Training Activities Analysis, (C) State Workforce Development Capacity [page 45-46]	(HECC OWI) We continue to strive to improve the collection and reporting of workforce system resource data. Please see also Answer/Response to Question/Comment 26.
18	We appreciate the WTBDs vision and goals (pgs. 50-52).	Worksystems	Part II. Strategic Elements, (b) State Strategic Vision and Goals [page 50-52]	No response required.
19	Page 53 – LWB assessments? What is the plan and timeframe for these?		Part II. Strategic Elements, (b) State Strategic Vision and Goals, (4) Assessment [page 52-53]	(HECC OWI) There is not a timeframe for these assessments at this time.

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20	How are business and job seeker satisfaction measured (p. 53)? We would recommend a third party be used for these measures and that the results be regularly shared with State and local Boards.	Worksystems	Part II. Strategic Elements, (b) State Strategic Vision and Goals, (4) Assessment [page 53]	<p>(OED) The key indicator of customer satisfaction performance for both individuals and businesses is Overall Quality, measured as the percentage of survey respondents who rated the quality of services they received as excellent or good. Another important measure of customer satisfaction is Likely to Recommend, which is the percentage of survey respondents who said they would be very likely or somewhat likely to recommend the services they received to others. The Customer Satisfaction Survey also gathers data on several other satisfaction drivers, including six Key Performance Measure (KPM) questions that are required by the Oregon State Legislature for both individual and business customers. The customer satisfaction survey is administered by Oregon Employment Department research division, which provides independent economic analysis for state of Oregon. Survey results are processed using third party vendor software and OED's information technology data tools. Survey results are available to the general public on the QualityInfor.org website under performance measures section. Public users can filter results to see businesses and job seekers customer satisfaction results based on local workforce board area, time period, demographics, and customer groups. Oregon Employment Department provided numerous presentations on how to navigate customer satisfaction dashboard to the state and the local workforce boards.</p> <p>(HECC OWI) We will consider the recommendation for a third party evaluation.</p>
21	Page 54 THANK YOU! (This work requires state agencies and local workforce boards to continue the shift from a compliance- and program-specific orientation to a highly-integrated, outcomes-based system that makes value-added investments based on community needs. This work will also require greater responsibility, accountability, and autonomy for decision making at the local level.)	Oregon Workforce Partnership	Part II. Strategic Elements, (b) State Strategic Vision and Goals, (4) Assessment [page 54]	No response required.
22	Who is creating the measurement systems for the standards (p. 54)?	Worksystems	Part II. Strategic Elements, (b) State Strategic Vision and Goals, (4) Assessment [page 54]	Please see Answer/Response to Question/Comment 9.
23	Page 58 cites (In addition, work continues to strengthen the framework for partnering by developing and implementing processes will make it easier for state agencies, local boards and other workforce organizations to work together and better understand each other's services.) HOW? We still need to map roles and responsibilities.	Oregon Workforce Partnership	Part II. Strategic Elements, (c) State Strategy, (2) Describe alignment strategies [page 58]	Please see Answer/Response to Question/Comment 47.

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24	How often does WSET meet and can the meetings be more public and transparent? Page 68	Oregon Workforce Partnership	Part II. Strategic Elements, (c) State Strategy, (2) Describe alignment strategies [page 58]	(HECC OWI) The Workforce System Executive Team is an internal cross-agency staff team. Meetings are not public. However, regular reporting occurs through the Higher Education Coordinating Commission Office of Workforce Investments (HECC OWI) Director to the Oregon Workforce Partnership.
25	How does the WSET Interface with the local workforce areas? How are local resources, programs and services considered by the WSET?	Worksystems	Part II. Strategic Elements, (c) State Strategy, (2) Describe alignment strategies [page 58]	(HECC OWI) Regular reporting occurs through the Higher Education Coordinating Commission Office of Workforce Investments (HECC OWI) Director to the Oregon Workforce Partnership. Additionally, WSET is a Team of core and additional state-agency partners and all of these agencies are represented on local boards.
26	<p>The strategy outlined to increase resources for occupational skill development is too narrow and could actually impede additional investments in training (p. 59). There should be an assessment of all resources in the system available (or potentially available) for training. If a threshold is still desired, it should be a combined measure based on all programs offering training.</p> <p>WIOA Title I is a diminishing resource (currently less than 1/2 of what Oregon received in 2000) and local areas need maximum flexibility to align and deploy those resources to the highest and best local use. For example, the City of Portland made a \$1.5 million training investment through the local Board to train women and people of color in the construction industry. The City made this investment because they could leverage Title I to fund administrative and coordinating activities which cost about \$150,000. In an age of diminishing local resources, this kind of flexibility must be maintained.</p>	Worksystems	Part II. Strategic Elements, (c) State Strategy, (2) Describe alignment strategies [page 59]	(WTDB) The Workforce and Talent Development Board (WTDB) agrees that resources have been declining and are currently insufficient to meet the need. The WTDB has an Imperative in their Strategic Plan to "Identify and align strategic investments", an Objective to "Increase funding", and an Initiative to "Identify all resources available in the system, including those that support underrepresented populations, and align for greater results". Each and all of these will focus effort on increasing resources in the broad workforce development system.

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27	How do local priorities, as reflected in comprehensive local plans, influence enrollment and prioritization in Adult Basic Education (Title II) programs (p. 63)? SNAP?	Worksystems	Part III. Operational Planning Elements, (a) State Strategy Implementation, (2) Implementation of State Strategy, (A) Core Program Activities to Implement the State's Strategy [page 63-64]	<p>(CCWD) Local priorities, as reflected in comprehensive local plans, influence many aspects of Adult Basic Education (Title II) programs. In Oregon recipients of WIOA TII funds are required to:</p> <ol style="list-style-type: none"> 1. Plan for and carry out activities and services that respond to the knowledge and skill needs of the workforce as described in the local workforce plan; 2. Plan for and carry out activities and services that align with the vision of the local plan; and 3. Plan for and carry out activities and services that align with the specific goals of the local plan. <p>(DHS) DHS supports Adult Basic Education such as GED programs and ELA in SNAP 50/50 provider programs. The Community College SNAP 50/50 Consortia comprises all 17 of Oregon's community colleges and they all offer Adult Basic Education programs to participants. There are also a large number of other providers statewide who offer Adult Basic Education in varying ways to SNAP recipients. SNAP 50/50 providers belong to local SNAP 50/50 Steering Committees where they are able to collaborate with local DHS Leadership and other providers to develop referral processes and understand the programs of each provider. DHS Central Office policy analysts are also available to help providers with strategies.</p>
28	How does the "strategic connectivity" work being undertaken by Trade Act include and align with local planning efforts (p. 72)?	Worksystems	Part III. Operational Planning Elements, (a) State Strategy Implementation, (2) Implementation of State Strategy, (B) Alignment with Activities Outside the Plan [page 72]	(OED) The Trade Act Program's service delivery model includes local area Trade Act Navigators (TANs) who are stationed at local WorkSource Centers across the state. TANs participate on local area teams. As we develop and design pilots with additional Federal programs, TANs will be gathering and providing information to local partners on how we can best provide services to customers enrolled in other Federal programs in addition to Trade Act.
29	Page 76 talks about employer feedback. I wish the new Plan would talk about how they hope to strengthen the quantity and quality of employer feedback the system receives. Also, I wish they would do a better job of capturing that information and communicating to local areas so we can better understand how well we serve business customers.	Oregon Workforce Partnership	Part III. Operational Planning Elements, (a) State Strategy Implementation, (2) Implementation of State Strategy, (D) Coordination, Alignment, and Provision of Services to Employers [page 76-77]	(OED) We analyze open text comments employers provide to us on monthly basis (through our customer satisfaction surveys) and categorize responses for OED's executive team. Our business services teams reaches out to businesses that had concerns with our recruitment services. This report is designed for OED executive team and is not shared with partners.
30	On page 93, I-Trac is managed by Worksystems, the Portland-Metro Workforce Development Board.	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (1) State Operating Systems that Support Implementation, (B) Data Collection and Reporting [page 93]	(HECC OWI) Note added in the PORTAL.

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31	<p>Notable - p. 95 - In July 2020, Oregon will discontinue its procedure for automatically co-enrolling customers in both Wagner-Peyser and WIOA Title I Adult and Dislocated Worker programs at the point they engaged in receiving WSO services. Eligible participants will become co-enrolled in in both Title III and Title I programs when they receive the first qualifying Title I service. This change will significantly lower the number of customers co-enrolled in Titles I and III, when compared to previous program years.</p>	Oregon Workforce Partnership	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (2) State Policies that Support Implementation of the State's Strategies [page 95]	No response required.
32	<p>On Page 100 it states - Although the WTDB's Imperatives, Objectives, and Initiatives will help focus local workforce development boards, but are not intended to act as an implementation plan for local services. LWDBs will determine how the work is done, creating plans that will work for the unique characteristics of each area. Acknowledging this is important and we need State agency leads and WTDB members to learn more about local efforts otherwise decisions are made in vacuum.</p>	Oregon Workforce Partnership	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (3) State Program and State Board Overview, (B) State Board [page 100]	(WTDB) The Workforce and Talent Development Board (WTDB) regularly includes reports and discussions with and about LWDB strategies, services, programs, and issues. The WTDB intends to continue to connect with LWDBs.
33	<p>An assessment report of all core programs by region should be developed and shared quarterly with State and local Boards (p. 103).</p>	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (4) Assessment and Evaluation of Programs and One-Stop Program Partners, (B) Assessment of One-Stop Program Partner Programs [page 103]	(HECC OWI) We will consider the recommendation for the development of additional data and reporting for state and local boards.
34	<p>What are the 80 workforce standards that will be tracked, reviewed and managed (p. 103)?</p>	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (4) Assessment and Evaluation of Programs and One-Stop Program Partners, (B) Assessment of One-Stop Program Partner Programs [page 103]	(HECC OWI) The WSO Operational Standards are the foundation of the referenced standards. Currently planned work in the future will fine tune and clarify this reference. Please see also Answer/Response to Question/Comment 9.
35	<p>How is the RESEA data shared with system partners?</p>	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (4) Assessment and Evaluation of Programs and One-Stop Program Partners, (B) Assessment of One-Stop Program Partner Programs [page 103]	(OED) RESEA reports quarterly to the USDOL and the main deliverables have been completed RESEA interviews. With changes to the program, reporting will likely change in the future but it is unclear what those changes will specifically be. As we have more information on reporting requirements, we can share with partners.

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36	The response to the question on page 105 says that WSET determines what programs will be evaluated and how. However, the question asks “how will evaluations of core programs be coordinated and designed in conjunction with State and local Boards”.	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (4) Assessment and Evaluation of Programs and One-Stop Program Partners, (D) Evaluation [page 105]	(HECC OWI) The need for additional narrative will be evaluated in an anticipated WIOA Combined State Plan modification due to the COVID-19 emergency.
37	Page 105 #5 – distribution of resources – why is OED exempt from this?	Oregon Workforce Partnership	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (5) Distribution of Funds for Core Programs [page 105-108]	(HECC OWI) Title III (Wagner-Peyser) funds have different requirements than Titles I and II. Due to these different requirements, this question is not applicable to Title III funds (OED).
38	The third bullet under (B) Title II should say WIOA (not WIA) definitions.	Worksystems	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (5) Distribution of Funds for Core Programs, (B) For Title II [page 107]	This has been corrected in the PORTAL.
39	When will all WSO centers have access to Video Relay Services? In Gresham and Eugene, WSO Offices have installed a Video Relay System (VRS) for assuring equitable access to the Deaf and Hard of Hearing (D&HH) community.	Oregon Workforce Partnership	Part III. Operational Planning Elements, (b) State Operating Systems and Policies, (8) Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities [page 125]	(OED) Please know that all offices have access to video interpretation services, allowing them to communicate with ASL customers and those speaking other languages as well. The Video Relay System (VRS) was installed as a pilot project in 2014 and to date has not been used. OED will continue to monitor and look for ways to increase usage, but does not plan to expand this service at this time.
40	Noticed no contingency plan for if the economy dips back into a recession with significant unemployment resulting. On page 140, it talks about Rapid Response and about Disasters in general. It talks at length about how strong the economy has been and how low unemployment has been. Considering the economy is struggling now, there is reason to update this.	Oregon Workforce Partnership	Part VI. Program-Specific Requirements for Core Programs, Adult, Dislocated Worker, and Youth Activities under Title I-B, (a) General Requirements, (2) Statewide Activities, (B) Describe Use of Governor’s Set Aside Funds [page 140-142]	(HECC OWI) There is a need for additional narrative in light of the COVID-19 emergency. The content of this additional narrative will be evaluated in an anticipated WIOA Combined State Plan modification due to the COVID-19 emergency.
41	Department of Human Services Vocational Rehabilitation Program and the Oregon Commission for the Blind should have independent program-specific responses.	Agency Input	Part VI. Program-Specific Requirements for Core Programs, Vocational Rehabilitation [page 209-361]	This has been corrected in the PORTAL.

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<u>No.</u>	<u>Question/Comment</u>	<u>Source</u>	<u>Reference</u>	<u>Answer/Response</u>
42	Page 276 – the paragraph just ends ... Feedback on Employer Relationships	Oregon Workforce Partnership	Part VI. Program-Specific Requirements for Core Programs, Vocational Rehabilitation, (j) Statewide Assessment, (1) Assessment of Rehabilitation Needs of Individuals with Disabilities, (D) Who have been Served through Other Components [page 276]	This has been corrected in the PORTAL.
43	This is a big one – relationship with WSO / VR feedback. The Vocational Rehabilitation and Commission for the Blind are essential services to individuals with Disabilities. Since the employment rate for people with disabilities decreased in 2019, there should be increased visibility and discussion on working through the feedback and issues people with disabilities face in the WorkSource Oregon system.	Oregon Workforce Partnership	Part VI. Program-Specific Requirements for Core Programs, Vocational Rehabilitation, (j) Statewide Assessment, (1) Assessment of Rehabilitation Needs of Individuals with Disabilities, (D) Who have been Served through Other Components [page 278-279]	<p>(VR) Thank you for the observation, The Oregon General VR Program agrees that more work needs to be done in aligning the resources available to reverse the trend of decreasing employment rate for Oregonians with Disabilities. The VR Program is addressing this internally. The Oregon Workforce System leadership needs to assess the current processes regarding planning, meeting, decision making, etc so that, not only issues regarding Oregonians with Disabilities access and success in utilizing the Oregon Workforce System can be evaluated and improved, but the System for all individuals pursuing Employment and stability outcomes can be addressed. Possibilities could include individual WorkSource settings surveying customers of all types to determine strength and weakness within a specific geographic setting. As issues regarding Oregonians with Disabilities are identified, The VR General program stands ready to assist as is appropriate to make recommendations regarding accommodations. The vast majority of Oregonians with Disabilities are not VR clients and may not need to be if the Workforce system has rudimentary understanding and flexibility in working with job seekers. Those Oregonians with Disabilities that are VR clients, can assist in identifying barriers and impediments and the VR program should work at all levels of the system, from LLT to highest exec levels to address the identified issues. The 2020 VR Comprehensive Statewide Needs Assessment that is currently in process will elicit more data on the effectiveness of the Workforce System in regards to providing services to Oregonians with Disabilities. The 2021-2022 VR Plan update will reflect this new information and will inform and influence future Strategies and Plans of the VR Program.</p> <p>(CFB) This comment resonates strongly with the Oregon Commission for the Blind. OCB is in agreement that significant workforce system improvements need to be identified and put in place to alter the trajectory of declining</p>

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No.	Question/Comment	Source	Reference	Answer/Response
44	<p>Our referral processes across public and nonprofit partners are outdated and need support since the systems to serve people are complex and in constant fluctuation. New technologies, like Unite Us, could serve as a path forward. (Page 286 - Addressing confounding service needs requires strong relationships with referral organizations, and clear communication between vocational rehabilitation counselors and clients regarding the appropriate resource to address different needs. Nearly 70 percent of staff and 90 percent of partners felt that some or most/all individuals needed referrals to community partners. Sixty (60) percent of individuals identified this need. Half of vocational rehabilitation staff felt that this service was received by some or most/all of the individuals who need it, compared to nearly 80 percent of program partners. Just over half (52 percent) of participants who reported this need indicated receipt. Increasing connections with community partners and supporting the ability of partners to serve people with disabilities may create more capacity in the broader service system. These partner agencies may assist people with disabilities to receive services addressing stability and self-sufficiency needs outside of, in addition to, Oregon Vocational Rehabilitation. Issues around information sharing and accessibility would need to be addressed to make these partnerships effective.)</p>	Oregon Workforce Partnership	Part VI. Program-Specific Requirements for Core Programs, Vocational Rehabilitation, (j) Statewide Assessment, (1) Assessment of Rehabilitation Needs of Individuals with Disabilities, (E) Who are Youth with Disabilities [page 286]	<p>(VR) Thank you for the observation. The VR Program recognizes the need for strong relationships and a sophisticated understanding of the individual programs within the Oregon Workforce System. It is a goal of the VR Program to continue to grow the relationships and provide VR staff with knowledge of processes and protocol of other programs so that Oregonians with disabilities can take full and equitable advantage of the resources available. Referral process continues to be challenge and should be addressed at the LLT level as well as in any executive level forum. Tracking continues to be challenging as the various different CM systems do not easily allow for integration. The VR Program feels that progress has been made but there remains much more to accomplish. Every program has a shared responsibility to provide information regarding process to partners and Oregonians, and the VR Program stands ready to assist as appropriate to reach out to Oregonians with Disabilities.</p>
45	<p>For the Expected Level of Performance for Wagner-Peyser, the Employment (Fourth Quarter after exit) and Median Earnings (Second Quarter after Exit) for both Program Years have been interchanged.</p>	U.S. Department of Labor Federal Project Officer	Part VI. Program-Specific Requirements for Core Programs, Appendix 1. Performance Goals for Core Programs [page 368]	This has been corrected in the PORTAL
46	<p>A significant way the State could help is setting expectations for partnerships and braided funding across everything that impacts people's success on reaching their potential. I assume this would need to happen through the Legislature. This is not limited to the Plan's called out programs, but also includes (Perkins, Block Grants, REO). When is the State planning on beginning these conversations?</p>	Oregon Workforce Partnership	General Question/Comment	<p>(WTDB) These conversations have begun. Oregon House Bill 3437 (2017) envisioned a broad system function for the Workforce and Talent Development Board (WTDB). Two examples include WTDB staff participation in the development of the State CTE Plan and the Adult Learning Advisory Committee (a joint WTDB and Higher Education Coordinating Commission committee).</p> <p>Please see also the Answer/Response to Question/Comment 2 and 47.</p>
47	<p>Key partners who can help make this plan a reality are not at the table of system coordination. (Oregon Department of Education, Dept. of Corrections, Early Learning Division, Nonprofits, community members served, etc.)</p>	Oregon Workforce Partnership	General Question/Comment	<p>(WTDB) The Workforce and Talent Development Board (WTDB) agrees with this assertion. The WTDB has a number of Imperatives, Objectives, and Initiatives related to expanding partnerships and taking a broad view of system alignment. Staff for the WTDB are involved in several cross-agency committees and teams regarding CTE/STEM, Career-Connected Learning and Work-Based Learning, Corrections Education, and others.</p>

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<u>No.</u>	<u>Question/Comment</u>	<u>Source</u>	<u>Reference</u>	<u>Answer/Response</u>
48	Increase remote access of services; bricks and mortar are outdated for many as transportation becomes a greater challenge. This means the entire state needs to have access to high speed internet.	Oregon Workforce Partnership	General Question/Comment	(WTDB) The Workforce and Talent Development Board (WTDB) agrees with this assertion. The Governor considers this a priority as well and has established an office that will develop broadband opportunities for rural and underserved areas of the state. Brown signed an executive order to create the Oregon Broadband Office on December 14, 2018.