

Responses to Public Comments

Comments are ordered and divided by sections that correspond to the organization of the instrument

Commenter	Page # and Section	Further explanation or comments	Response to comment
General State Plan Comments.			
Charlie Hopewell, Oregon Workforce Investment Board	Add in	Include explanations of the ability to modify and adjust state plan before the end of the four year plan. Also include language highlighting the Governors charge to include relevant partners and programs.	Such explanations will be included the approval and transmittal letters from the Governor and Oregon Workforce Investment Board (OWIB) Chair. No change to document.
Susan Gabay, Department of Human Services District 9	Throughout document	Page 36 first paragraph " <u>Tittle</u> II" Page 37 3 rd paragraph states goal (singular) is to " <u>markets</u> " (should be market) Page 43 paragraph starting Title IV talks about "VR is participant (should be <u>is a</u> participant) Page 36 and 46 have duplicated same exact paragraph...is that intended, necessary? Paragraph starts "Executive leadership"..... Page 67 last paragraph has "Community <u>Collages</u> "	Thank you for your recommended corrections.
Oregon Workforce Partnership (OWP)	Throughout the document	The proposed plan continues to promote a programmatic rather than a systemic response to workforce development. There is an opportunity to better serve Oregonians by implementing a unified, integrated system rather than a series of separate, disconnected programs. We consider WSO to be the mechanism by which to further build that integrated system.	We agree with the comment and will continue working towards integrated systems. Some of the programmatic response is due to the challenge of responding in the way Department of Labor (DOL) asked for information to be provided in the Unified Plans.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	Community Colleges play an integral part of the workforce systems through various programs such as CTE, Career Programs and other technical training programs. The state plan should be more direct in including the community colleges role in the workforce system.	We agree and have added language about Community Colleges in a number of sections, including to the State Program and Board Overview section.

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OWP	Throughout the State Plan	There is no systemic connection between the workforce organizations resourced to provide services to the most vulnerable Oregonians and the existing WSO system.	Language was added to the Overview of the Workforce System section (page 7) from the OWIB Strategic Plan describing the workforce development system in Oregon as including the programs and services of additional state and local agencies and organizations.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	References to “soft skills” should be included in the document as an important point of reference for what employers ask for in workers.	Additional information on soft skills has been added to Section II.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	We strongly recommend the inclusion of Community College Career Pathways in the various sections as appropriate.	Language has been added on Career Pathways in appropriate sections.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	We request that all the “systems, framework and templates” are developed with both state and local knowledge.	Graphics and text depicting the workforce system have been edited to better reflect the state and local delivery systems.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	Information as to how partners will be involved in vetting, revising or understanding these standards would be helpful to avoid confusion about, in particular, the role of the WSO standards in adult basic skills services.	The WorkSource Oregon (WSO) Operational Standards, designed to set the minimum expectations for WorkSource Oregon Centers, were developed by a team of representatives from all of the identified WSO partners (see pgs. 5 & 6 of the Standards). The final document was compiled on a timeline that ran concurrent to the early implementation of the Workforce Innovation and Opportunity Act (WIOA) and, as such, changes at the Federal and/or State level will result in revisions to the WSO Standards. As WIOA regulations and guidance are finalized, and as the partners in Oregon’s workforce system gain clarity regarding federal and State strategies and initiatives, the WSO Operational Standards will be revised periodically, with

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			appropriate partner and stakeholder participation.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	Title II is referenced throughout the document, but at some points it is unclear whether the information pertains to state level or local level work. In addition to referencing Title II providers to indicate local program providers, it would be helpful to indicate CCWD Title II in all references to state level Title II.	Clarifying language has been added in various sections to make a distinction between Title II providers and the Office of Community Colleges and Workforce Development (CCWD) at the state level.
Janet Bauer, Oregon Center for Public Policy	Throughout State Plan	The document should be revised throughout to describe a strong vision and the implementation details for serving individuals with barriers, as directed in the recent information collection request (ICR) guidance from the Department of Labor.	Agree that additional language was needed in the State Strategies to achieve its Vision and Goals section (page 34) to explain that all of the strategies include a focus on improving services for all customers, especially individuals with barriers to employment.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	Thanks to WIOA, Oregon has the chance to invest resources in successful models and implement best practices to expand job opportunities for people with disabilities. To help the states succeed in this process we developed a resource called the Disability Employment First Planning Tool. This document details best practices and effective models. This toolkit contains models that are proven to work, be cost effective to implement, and be successful.	No change to overall section. Will consider recommendations during implementation.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	Finding market niches with high turnover jobs. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.	Suggestion is addressed in Section VI for Title IV Vocational Rehabilitation (VR).

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Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	Local Planning efforts need to include planning for disability employment efforts. A key facet of Oregon’s approach to implementing Sector Strategies is to delegate much of the work to local boards. This emphasis on local organization and planning throughout the draft WIOA Unified State Plan creates unique challenges in the drive for improved employment outcomes for Oregonians with disabilities. While regional differences needed to be accounted for, guiding this entire process needs to be a unifying vision and clear sense of what works. In the Disability Employment First Planning Tool the practices can be adapted and applied to meet the unique challenges created by the emphasis on regional organization in Oregon’s Draft State Plan. There is already some work being done in this sector through the Youth Transition Program in Oregon and it should be referenced in the State Plan.	It is true that there is already some work being done in this sector through the Youth Transition Program (YTP) in Oregon. VR has strong working relationships with many of the Local Workforce Development Boards (LWBs) across the state and will be working with the new and existing LWBs to further develop these partnerships (w/ summer work experiences, co-service agreements, etc...)
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	Transportation is a vital component and it must be addressed directly. It is vital to work with public transportation to ensure that there are bus routes to places where there are internships, apprenticeships and other work opportunities.	Suggestion is addressed in Section VI for Title IV Vocational Rehabilitation.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	The disability issues of people involved in the corrections system must be addressed. It is vital that Oregon identify how many of the individuals in the ex-offender pipeline have disabilities. Such an effort could easily be integrated into the current draft of Oregon’s WIOA State Plan. We would recommend that screening for disabilities be part of the assessment tools used to support corrections education programs.	VR is working with ex-offenders and is looking forward to developing a more systematic approach in collaboration with the Workforce System to address employment needs of this group. VR and Oregon Department of Education (ODE) are in conversation regarding the provision of PETS services to incarcerated youth in the Oregon Youth Authority (OYA), and are in the process of jointly developing an appropriate curriculum. Conversations are also taking place about adding language to the ODE/VR MOU regarding this group.

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Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	Nothing About Us Without Us. We recommend that your state plan look at adopting language which would include the placement of a representative from the disability community on such critical decision making bodies as the Oregon Talent Council (OTC). This is a critical gap that should be closed. Likewise, the State Plan could also direct local workforce boards to connect with local community organizations to recruit self-advocates.	Outside the scope of the plan, but will forward recommendation to the OTC.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Throughout State Plan	State Level Affirmative Action –hiring of people with disabilities for jobs in state government and state contracting obligations. Specifically, state government hiring and contracting can also be a source of opportunity for people with disabilities. This is an action that Oregon should take in so far as “Local government employment is recovering as budgets have recovered”	Outside the scope of the plan. There are other state pilots and efforts ongoing to address the suggested action.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	A reference point differentiating what is required vs. optional in terms of co-location is needed to clear up confusion among partners on this point	Waiting for federal regulations to be finalized and will be separately addressed by the OWIB. Prior to final federal guidance, the level of required vs. optional co-location cannot be addressed. However, it is the state’s intention that, as far as possible within final guidance, local areas determine levels of co-location based upon local service strategies, needs of clients, and partner organization capacity and resources. Co-location is only one approach, and other ways of improving access across the core programs may be more appropriate depending on local needs and resources. No change to document.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	A reference point clarifying that references to education in the document should most often indicate that both K-12 and post-secondary institutions are being referenced, unless only post-secondary institutions are actually referred to.	Clarifying language added in certain sections, but the state plan was developed primarily in response to federal WIOA plan requirements. We understand that this does not reflect the roles of Community Colleges.

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Dana Young, on behalf of 17 community colleges	Throughout the State Plan	References to I-Best, VESL and OPABS programs should include a statement that indicates other Integrated Education and Training programs may also be implemented.	Additional language added in certain sections. We recognize the value and contributions of the Community College system and will continue to work with the colleges in WIOA implementation.
Janice Norton, Aging and People with Disabilities	Throughout the State Plan	It would be nice if VR services would be more pro-active in helping the TANF unemployed gain skills and employment. I realize these clients are more challenging, but they do need assistance in this capacity. I see many who do not meet the criteria for SSI/SSDI, that OVRS has declined to work with. I hear things like “they aren’t motivated, I can’t place that person.” So what can they do. Many are just being recycled through the system. VR has the resources.	Addressed in Section VI. This is an internal issue at the Department of Human Services (DHS), which they are working closely together on and making progress to serve the right clients in the right place. VR is working with the Self-Sufficiency programs (SSP) to enhance the referral process and to better coordinate collaboration and the provision of services to the clients from the SSP programs.
Dana Young, on behalf of 17 community colleges	Throughout the State Plan	References to cross-training of partners in the State Plan could be strengthened by identifying how partners will be involved in building the “system, framework and/or template” to be used in this cross-training	Clarifying language added in certain sections.
Section I. Oregon WIOA State Plan Type			
Oregon Workforce Partnership	Section I	Expand the scope of the state plan to include the Temporary Assistance for Needy Families (TANF) Jobs program, Supplemental Nutrition Assistance Program (SNAP) employment and training programs, Corrections employment programs, Trade Act, Unemployment Insurance, Veterans Employment Services and other relevant programs to assure a comprehensive approach.	<p>The Governor’s Office has decided to submit a Unified Plan but directed the agencies that this plan should include explicit segments on how collaboration and alignment are and will be occurring with additional partners. Partners administering the following have participated in development of the plan:</p> <ul style="list-style-type: none"> • SNAP and TANF at DHS • Trade Adjustment Assistance and Job Services for Veterans at OED • Unemployment Insurance at OED <p>The intent is to continue to expand the partners participating in a streamlined workforce system year over year. Local board can involve more partners in their planning processes.</p>

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Section II. Strategic Planning Elements			
Oregon Workforce Partnership	Section II	Identify WSO as the foundation to build further program integration and alignment	The plan reflects the partnership and collaboration of many agencies and organizations, but WSO is identified as a foundation in many sections. All partners are engaged in program integration and alignment at the state and local level. No change to document.
Susan Gabay, Self Sufficiency Program Manager District 9	Pg. 30 Performance Measures	Will the 7 system performance measures adopted by the OWIB measure equity and whether all populations will be served equitably?	Interagency working groups and OWIB committees are working to identify best practices and dashboards. The state's intention is to integrate equity principles across workforce system and WIOA implementation. No change to document.
Sylvia Kelley, on behalf of Portland Community College	Pg. 8-24 Equity and Inclusion	PCC hopes to see a more in-depth economic and workforce analysis using an equity and inclusion lens such as an analysis of any disparities for communities of color threaded throughout all sections of the economic and workforce analysis, not just as a standalone section on Oregon's population for example to see urban and rural employment rates broken down by population. They would also like to see an economic and workforce analysis for other populations being focused on in WIOA, including disconnected youth, under-skilled adults, non-native English speakers, and low income Oregonians. Lastly, it seems important to mention Oregon's high rate of growth in the 2015 along with the trend of importing talent to fill new and replacement jobs. This speaks to the importance of closing the skills gap and offering training to disconnected youth, under-skilled adults and low income Oregonians.	State's intention is to integrate equity principles across workforce system and throughout WIOA implementation. Additional information has been added to Section II describing the employment status of population groups within Oregon, including population groups with traditional barriers to employment. Where available, data on these and other populations will be used in WIOA implementation.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 13	According to the recent ICR, state plans must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA. The relevant section of the draft plan, beginning on page 13,	Additional information has been added to Section II describing the employment status of population groups within Oregon, including population groups with traditional barriers to

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		describes two such populations (older workers and long-term unemployed) but leaves out other groups that are prominent in Oregon’s struggling workforce. This section should describe the population of low-income individuals (Oregon’s poverty rate remains higher than during the Great Recession; see latest data), ex-offenders, homeless individuals, youth who are in or have aged out of the foster care system, English language learners, individuals within 2 years of exhausting lifetime eligibility under TANF and single parents including single pregnant women.	employment. Where available, data on these and other populations will be used in WIOA implementation.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 22	The draft plan does not describe the workforce system to include activities within human services, specifically the JOBS program for individuals participating in TANF. This omission expresses a limited vision of systems in silos rather than systems whose assets can be coordinated, upon which to capitalize. The presence of the JOBS program and a vision for better integrated systems could be included in the subsection, Strengths and Weaknesses of Workforce Development Activities (beginning on page 24), but in any case, both should be included somewhere in the broad section.	Agree that plan does not describe complete workforce system in Oregon. Language has been added to the Overview of the Workforce System (page 7) and Strengths and Weaknesses of Workforce Development Activities (page 27) sections providing description of TANF and SNAP services as part of the workforce system. TANF and SNAP are mandatory partners and services will be accessible in the one-stops. Oregon has chosen to submit a Unified Plan at this time, although language in the plan and communications from the OWIB and the Governor outline expectations that the workforce system includes the self-sufficiency programs at DHS.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 28, State Strategic Vision and Goals	In order to address the unique needs of families in poverty, communities of color and rural communities as intended by the OWIB, Goal 1 to “create a customer-centric workforce system” should include coordination with various human services entities at the state and local levels that serve those communities. This reality should be spelled out in the Goal 1 detail on page 29 as well as associated strategies (beginning on page 31).	Language has been added to the Overview of the Workforce System (page 7) and State Strategies to achieve its Vision and Goals (page 34) sections describing the relationship between the strategies and state and local entities who are part of Oregon’s workforce system, including state and local human services organizations. Further work to identify implementation plans for these strategies is needed, but will include

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		<p>Also, strategies to achieve Goal 3 to “actively reach out and engage customers, especially target populations, in education, training, employment, and entrepreneurial opportunities,” would need to include strategies to address needs of populations with barriers. (Beginning on page 33). At a minimum, strategies should include coordinating with state agencies that serve those populations.</p>	<p>coordination between all agencies of the workforce system.</p>
<p>Janet Bauer, Oregon Center for Public Policy</p>	<p>Beginning on page 35, State Strategy</p>	<p>Include discussion of specific strategies to address the needs of populations provided in Section. This section lacks this required discussion of strategies. As a start, key strategies could be developed in consultation and coordination with state and private human services providers.</p>	<p>The strategies were developed by the OWIB and planning subcommittees, which included representation from a variety of workforce system stakeholders, including state and private human services providers. See OWIB Strategic Plan (www.oregon.gov/owib) for a list of the individuals and organizations who participated. Language has been added to the State Strategies to achieve its Vision and Goals (page 34) section.</p>
<p>Philip Pauli and Jennifer Laszlo, on behalf of Respectability</p>	<p>Section II</p>	<p>Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics. RespectAbility is pleased to see a discussion of the critical stigmas, misconceptions, and attitudinal barriers that keep far too many people with disabilities from being able to pursue the American Dream. However, this section is completely useless without quantifying the actual number of people with disabilities living in Oregon. Precise numbers and clear statistics are needed if Oregon is to make any serious progress in terms of employment outcomes for people with disabilities.</p>	<p>Additional information has been added to Section II describing the employment status of population groups within Oregon, including population groups with traditional barriers to employment. Where available, data on these and other populations will be used in WIOA implementation.</p>
<p>Philip Pauli and Jennifer Laszlo, on behalf of Respectability</p>	<p>Section II</p>	<p>There are two critical data points that need to be added. First, it is critical that the Plan include data related to the number of Oregonians with disabilities between the ages of 16 and 20 as well as working age people with disabilities between 20 and 64 years of age. Second, it is absolutely critical that Oregon’s workforce system include the labor</p>	<p>Additional information has been added to Section II describing the employment status of population groups within Oregon, including population groups with traditional barriers to employment. Where available, data on these and other populations will be used in WIOA</p>

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		force participation rates of people with disabilities both in their performance metrics and on their state dashboards. Additionally, it is vital to monitor the employment rates of young people with disabilities by type of disability.	implementation.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	Include more detailed statistics when speaking of the labor force participation rates to include people with disabilities. For example, can PRISM be used to share the LFPR of people with disabilities with partner organizations or state agencies?	Additional information has been added to Section II describing the labor force participation rates, where available, for people with disabilities.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II, Pg. 31	Ensure that Apprenticeship programs in Oregon are fully accessible and actively recruiting Young People with Disabilities.	Where appropriate, VR and workforce boards and organizations are working with apprenticeship programs to provide opportunities for youth with disabilities. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	We hope Oregon’s workforce system will seriously consider that attitudinal barriers, stigma, myths, and misconceptions about people with disabilities are a critical obstacle in the push for improved employment outcomes. Our perspective as an organization is that the barriers created by stigma will be broken by using what we call a—Jackie Robinson Strategy. Helping young people with disabilities to successfully transition into the right jobs for them in the workforce will create a path for those who may have a greater need for employment supports to also succeed. Oregon can do this by focusing WIOA resources on what works best – early interventions, paid internships, academic internships, connecting youth with apprenticeships, job coaching, and other best practices.	Strategies included in the plan address marketing coordinated system services (Strategy 1.5), active communication with business (Strategy 2.3), and active reaching out and engagement of customers (Strategy 3.1). These strategies are intended to be implemented locally and local plans should include activities designed to help people with disabilities access education, training, employment, and entrepreneurial opportunities. No change to document.

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Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II, Pg. 36	We suggest that this Executive Leadership, in their work with regional partners, have an opportunity for leadership. As a specific, easy, first step, they have a chance to focus on one of the important best practices that encourage innovative thinking and engagement around jobs for people with disabilities. That step is to conduct site visits to successful disability employment programs and model systems. Touring a model employer who is capitalizing on the talents of employees with disabilities can be an eye opening experience. As such, it should be a priority to help regional partners to serve job seekers with disabilities.	VR and other workforce partners use best practices as appropriate to meet the needs of all Oregonians. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	More emphasis is needed in Oregon’s Unified State Plan around the employment opportunities and talent challenges created by the Section 503 regulations and federal contractors. Oregon needs to respond to the opportunity created by Section 503 with a strategy focused on competitive advantage, not just compliance. Greater depth and detail is needed here and elsewhere in the Plan.	Information is provided in Section VI of the plan. All VR staff are informed of 503 requirements and VR is working to capitalize on the 503 requirements by using them to create opportunities for Oregonians with disabilities.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	Examine the Gap in Performance Metrics between Oregon and other states like Alaska, the Dakotas, Wyoming, and Iowa.	Local partners have ability to choose and examine performance metrics to best meet needs as defined locally with state assistance. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	In looking for ways to address those —Replacement Openings , we recommend that the state’s workforce system look for ways to train and prepare the seven out of ten Oregonians with disabilities to plug those gaps. People with disabilities represent an untapped talent pool and one that needs to tapped for the sake of growing the economy. As such, we recommend that the Plan be amended to consider what role Oregonians with disabilities can play in the future workforce.	The State Workforce System is working to provide services to all Oregonians. Strategies included in the plan encourage local plans to include activities designed to help people with disabilities access education, training, employment, and entrepreneurial opportunities. No change to document.

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Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section II	We therefore recommend that the Unified State Plan be amended to include a communications/public relations strategy for reducing such stigmas. Several sections of the Plan talk about outreach to business with a focus on educating employers about how the workforce system can train job seekers to meet their labor needs. The unique talents and tremendous skills of employees with disabilities need to be a key part of that conversation. This type of effort needs to begin at the highest levels of state government. It is also critical that Oregon VR staff and community agencies be prepared to support companies in dealing with their specific fears and stigmas.	Strategies included in the plan address marketing coordinated system services (Strategy 1.5), active communication with business (Strategy 2.3), and active reaching out and engagement of customers (Strategy 3.1). Outreach to all employers is based on an individual's skills, not their disabilities. We believe that this strength-based approach helps remove these stigmas. No change to document.
Section III. Operational Planning Elements			
Debra Swafford, District 7 Self Sufficiency Programs	Page 66, State Program and State Board Overview	The map does not show Coos Self Sufficiency office	Upon further review, this map was deleted from the final document as it did not provide the appropriate information. A new map showing the DHS Districts and the relationship to Local Workforce Investment Area Boundaries has been added.
Greg Ivers, Department of Human Services	Page 65-67, State Program and State Board Overview	Add in language about SNAP as it is not included. Also, insert Oregon Demographics diagram showing special populations.	Additional information was provided by DHS and has been included in the final document.
Susan Gabay, Department of Human Services District 9	Pg. 49	While initially mentioning a feedback loop including employers and trainees of the WorkSource Oregon job search system, the document then fails to explain how feedback from job seekers will be utilized to improve services delivered. Wouldn't there also be a feedback loop from the job seekers' perspective? Especially since job seeker satisfaction is called out in page 7 under performance measures.	The feedback loop will be addressed in the WSO Standards and are still being developed. No changes have been made to the document.
Susan Gabay	Pg. 66	On page 66 it shows a map reflecting Self-Sufficiency and Vocational Rehabilitation Offices; We have both SSP and VR	Upon further review, this map was deleted from the final document as it did not provide the

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		offices in Hood River and Wasco Counties which are reflected there but it additionally shows a VR office in the southern part of Sherman County. That is incorrect! There are no offices based in Sherman, Wheeler and Gilliam counties. Both Self Sufficiency and VR cover those counties on an itinerant basis out of their offices based in The Dalles.	appropriate information. A new map showing the DHS Districts and the relationship to Local Workforce Investment Area Boundaries has been added.
Oregon Workforce Partnership	Section (2)	Require State Agency Directors in charge of core workforce programs to develop and implement a cooperative agreement that clarifies expectations for program and resource alignment at the state level.	The State Plan identifies the general agreements of Oregon’s workforce development system. More specific agreements (MOUs) will be developed locally. No change to document.
Oregon Workforce Partnership	Section (b)(3)	Require workforce programs that serve targeted populations identified in local plans to prioritize service for individuals actively engaged in the WSO system.	The intent of the state is for local boards to identify priority populations for service, although core programs have certain legal requirements for priority of service too. No change to document.
Oregon Workforce Partnership	Section (a)(2)(b)(2)(A) and (B)	Describe a plan to develop mechanisms for data-sharing and shared performance reporting across workforce system programs.	The workforce development system will continue work on data sharing and performance reporting. We are waiting on additional federal guidance to continue development of PRISM 2.0 to assist in performance reporting. No change to document.
Oregon Workforce Partnership	(b)	Reaffirm the role of LWBs in convening local workforce system stakeholders, reviewing and approving local Title II service providers, and identify strategies to serve targeted populations	While the LWBs review Title II applications and provide feedback on the alignment of the application to the local area plan, Title II service providers are selected through an RFA process carried out by CCWD, the responsible agency. While local plan alignment is a critical factor, it is only one element in several that will be used to decide which applicants will be granted Title II contracts. LWBs do not, therefore, “approve” Title II service providers. No change to document.

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Oregon Workforce Partnership	(b)	Specify the expectation of workforce partners to invest in the WSO service delivery system and to utilize the existing service delivery model to continue to build a more integrated system.	Workforce partners will invest in the system using a new tool as a way to gain agreement on infrastructure and program staffing costs and investments. Further conversation to happen between state and local partners. No change to document.
Sylvia Kelley on behalf of Portland Community College	Pg. 67 Effective partnerships	PCC has partnered for over 26 years with DHS in Multnomah and Washington County to provide innovative service for TANF and SNAP recipients and led a community college consortium over the past year to support SNAP recipients in entering college Career Pathways. The colleges are called out in the plan as a partner for SNAP 50\50 initiative but are also taking a leadership across the state in collaboration with DHS and the LWIBs on these efforts.	Community Colleges are mentioned as part of the steering committee listed on page 69. No change to document.
Sylvia Kelley on behalf of Portland Community College	Pg. 63 & 68 Business Engagement	PCC would like to see stronger integration of business engagement in the plan. Community colleges actively engage with employers in the following ways: Career and Technical Education programs advisory committees, engaging with employers to create new programs, PCC programs have internship\co-op experience opportunities, PCC's Foundation works closely with employers to identify fundraising opportunities, and employers regularly hire graduates of programs at PCC.	Additional business services were added to the Local Service Delivery graphic (Workforce Training and Continuing Education) and Community Colleges were added to this section under Local Service Delivery.
Dana Young, on behalf of 17 community colleges	(a)	Education and training are essential to high-demand, high-wage jobs, not merely a "suggested" part of the solution as this document implies. There is a lack of any mention of secondary or post-secondary education and training in at least one programmatic section. No traditional educational approaches are mentioned in the Rethinking and Restructuring Training and Skill Development section. It makes sense to call out Community Colleges as a key partner in continuing educational efforts that are working well, and to achieve improvements. Substantial engagement of community colleges with industry is not mentioned	Clarifying language added in certain sections, but the state plan was developed primarily in response to federal WIOA plan requirements. We understand that this does not always reflect the roles of Community Colleges in the Oregon workforce system.

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		anywhere in the document. This work directly aligns with the industry-driven, customer orientated approach to the plan.	
Dana Young, on behalf of 17 community colleges	(a)(2)	Community Colleges are key partners with business while Local Workforce Boards play a key role in WIOA in convening business, coordination and integration of business outreach with the colleges is critical because of the high level of engagement with businesses that is ongoing at the community colleges.	The state does not intend for the important role of the LWBs in convening employer partners in a number of WIOA efforts to mean that Community Colleges would not continue to build and sustain the relationships that they have with employers. Coordination and integration of employer engagement across partner organization is critical to meeting the plan goals, as identified in the strategies.
Dana Young, on behalf of 17 community colleges	(b)	Points of reference should be included such as a 40-40-20 diagram and a definition of what exactly constitutes the "Oregon Workforce System". To be accurate, this "system" encompasses more than WorkSource and the various Titles, and perhaps enhancing and editing existing diagrams in the document might be helpful to illustrate this.	Language describing the workforce development system has been added to Section II. Changes to state and local delivery graphics have also been made in Section III.
Dana Young, on behalf of 17 community colleges	Pg. 60	The diagram on pg. 60 includes funding levels for a variety of workforce development entities. Recommend that funding levels for Title II, Carl Perkins and community college support fund be included under the HECC.	Upon further review, the graphic was updated and budget numbers deleted because they were out-of-date and not necessary for the purposes of the State Plan.
Dana Young, on behalf of 17 community colleges	Pg. 62	The description on pg. 62 should include a description of Career Pathways. Also, language emphasizing that community college Career Pathways certificates are developed in partnership with employers would be helpful.	The State Program and State Board Overview section has been updated to better describe the state agency roles of the Higher Education Coordinating Commission (HECC) and CCWD and a map of Community College service districts has been added to a new Local Service Delivery subsection.
Dana Young, on behalf of 17 community colleges	Pg. 63	Graphic on pg.63 should add workforce education and continuing education under "Business" section of community colleges to capture services more fully.	Requested changes have been made to the graphic.

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Dana Young, on behalf of 17 community colleges	Section III	Measuring both skill level gains and achievement of WIOA outcomes will be important, in order to preserve needed services for Oregonians who are not well served by “quick fixes”. The GED test, newly implemented in 2014, will take longer for students to earn this credential. Whether skill gains in Title II Adult Basic Skills are measured using the current metrics or updated elements, transition and retention between skill levels is critical to achieving WIOA outcomes and should be emphasized.	Clarifying language has been added to Section III.
Janet Bauer, Oregon Center for Public Policy	Beginning on page 45, Alignment with Activities Outside the Plan	The state plan should conform to the ICR guidance to describe how activities... will be aligned with programs and activities provided by ... human services... assuring coordination of, and avoiding duplication among these activities.” This discussion is missing in the draft plan.	Additional language has been added to this section to comply with the revised DOL requirements.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 48, Coordination Alignment and Provision of Services to Individuals	Likewise, this section does not yet conform with the ICR guidance in that it does not describe how the core program activities will coordinate activities with human services partners to provide “comprehensive, high-quality, customer-centered services, including supportive services to individuals” with barriers to employment.	Additional language has been added to this section to comply with the revised DOL requirements.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 58, State Program and State Board Review	The plan should better outline the role of DHS as an accountable agency in outcomes. Perhaps this detail is appropriate elsewhere; however, it should be included somewhere.	The State Program and State Board Overview section has been updated to better describe the state agency role of DHS and to separate the local service delivery portion. Accountability measures have been added to the Assessment of One-Stop Partners Programs section.
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 70, Assessment of One-Stop Partner	Consider including assessment of performance for Self-Sufficiency programs such as TANF and SNAP.	Language has been added to the Assessment of One-Stop Partners Programs section.

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	Programs		
Janet Bauer, Oregon Center for Public Policy	Beginning on pg. 82, Adult and Dislocated Worker Program Requirements	Describe how the State will implement and monitor the <i>priority</i> for public assistance recipients, other low-income individuals, or individuals who are basic skills deficient... which applies to individualized career services and training services funded by the Adult Formula program.” As yet, the plan lacks a description of how it will implement and monitor priority of service for these populations, but should include these descriptions. Related to this, the state will need to provide an assurance that “the State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients or basic skills deficient.”	This was a new element in the revised DOL requirements made available after the public comment draft was distributed. A response to this requirement has been added.
April Hamlin, on behalf of Umpqua Community College (UCC)	Section III and pages 42, 50 and 63	Customized training is specifically for large groups and scheduled by a specific business/employer. We would like to see continuing education listed as well as customized training. Continuing education is specifically directed toward individuals wishing to increase and improve their job skills. The goal of customized training is employer satisfaction and employee retention. The goals of continuing education are individualized, according to the needs of the student. We think that continuing education needs to also be included in the narrative and graphics on page 42, 50, and 63	The Local Service Delivery graphic and accompanying text has been edited to add the requested service of Community Colleges. The graphics for the WSO Standards have not been changed.
April Hamlin, on behalf of UCC	Section III	Soft Skills are regularly brought up by employers as a necessary component that they are looking for in an employee. Yet, there is no mention of soft skills throughout section 3.	Clarifying language on soft skills has been added to Section II (pages 15-16) and Section III (page 53).
April Hamlin, on behalf of UCC	Section III, Pages 65-75	Federal participation requirements do not coincide with the same guidelines and requirements as WIOA. Therefore, this can be difficult to work with other WIOA providers that have different objectives and performance measures to assist	All core partners have measures that are program specific, as well as the WIOA measures that are common across the system. The state will continue to analyze performance data to

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		<p>people in entering the workforce. Without these fundamental educational and training opportunities, clients are placed into low-wage and low-interest jobs. Yet, job placement is the core measure of performance, not whether employees persist, retain employment, or receive the services that would be required in order to maintain employment.</p>	<p>ensure that WIOA services are of benefit to all Oregonians. No change to document.</p>
<p>April Hamlin, on behalf of UCC</p>	<p>Section III</p>	<p>Title II programs at the local level need to be able to coordinate their activities under the umbrella of Integrated Education and Training (IET) programming. Although several models are specifically called out (I-BEST, VESL, and OPABS), the larger umbrella of IET and career pathways should be the primary umbrellas under which Title II activities should occur. This is specifically mentioned on page 40, 52, and 53. Further, if the plan specifically requires Title II programs to “be involved in improving access to post-secondary credentials...” then the RFA process should definitely describe how Title II programs propose to achieve this—particularly if they are not tied to providers already connected to the Community Colleges.</p>	<p>All core partners have measures that are program specific, as well as the WIOA measures that are common across the partnership. The state will continue to analyze performance data to ensure that WIOA services are of benefit to Oregonians. CCWD will consider this input during the RFA development process. No change to document.</p>
<p>April Hamlin, on behalf of UCC</p>	<p>Section III, pg. 42</p>	<p>In the graphic on page 42, the MEASURES should read in the order of which a person could reasonably be expected to achieve them, namely: Education-Training-Credentials-Employment-Earnings-Retention-Satisfaction. The current order of “measures” is out of order and missing several key pieces in order to achieve.</p>	<p>Thank you for your comment. The measures listed are the WIOA measures and are not listed in any particular order. No change to document.</p>
<p>April Hamlin, on behalf of UCC</p>	<p>Section III</p>	<p>This document goes back and forth in making co-location optional or required. Issues such as cross-training, staffing, non-duplication of services, and assessment of services/performance need to be made much clearer in the Unified state plan so that core partners can include that in local planning.</p>	<p>Prior to final federal guidance, the question of required vs. optional co-location cannot be addressed. However, it is the State’s intention that, as far as possible within final guidance, that local areas determine levels of co-location based upon local service strategies, needs of clients, and partner organization capacity and resources. Co-location is only one approach, and other</p>

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			ways of improving access across the core programs may be more appropriate depending on local needs and resources. No change to document.
April Hamlin, on behalf of UCC	Section III, Pg. 46	Do the WSO standards actually require Title II services? This seems to indicate confusion between the co-location option/requirement for all core partners.	The WSO Operational Standards require that Adult Education and Literacy activities be accessible at WSO locations. The WSO Operational Standards state that, “Adult Education and Literacy activities... will be available through WSO centers.” They continue, “The frequency and intensity is dependent upon local plan strategies and customer demand.” This section of the WSO Operational Standards is meant to allow for some level of local flexibility in how these services are accessed (directly onsite, via electronic/remote technologies, through referral, etc.), while maintaining a standard that there is some type of access at all WSO-branded locations.
April Hamlin, on behalf of UCC	Section III, Pg. 48	Title II providers in local areas should also create, maintain, and build connections with training providers for career pathways and workforce preparation activities.	Language has been added to section.
April Hamlin, on behalf of UCC	Section III, Pg. 48	We believe that “education” needs to be specifically defined as K-12 and post-secondary institutions.	Thank you for your comment. No change to document.
April Hamlin, on behalf of UCC	Section III, Graphics on Pg. 50	Please make the connection between Career Services and Training Services much more fluid. Training services should be coming prior to job placement. Please also include credentials, career pathways, and continuing education on this graphic.	Thank you for your suggestion. The graphics for the WSO Standards have not been changed. The Local Delivery of Services to Customers graphic on page 69 includes this information.
April Hamlin, on behalf of UCC	Section III, Pg. 51	Building Partnerships to Connect School to Work makes the OWIB responsible for making connections between education and workforce development and business. Where does the WSO come in? Where is the responsibility for	These questions will need to be discussed at the OWIB and State/partner levels. The OWIB Strategic Plan, the WSO Operational Standards, and modifications to the State Plan itself are

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		education and training prior to job placement from all the core partners?	some of the documents that could be revised as a result. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III, Pg. 74	This system needs to include detail metrics on disability and employment. Additionally, on page 74, the Plan discusses the —Assessment of Participants’ Post-Program Success and indicates that research is being done on the —use of additional indicators to monitor service delivery in real-time, improve outcomes, and respond to immediate needs of our local communities. We would submit, once again, that this is point what data on people with disabilities in workforce is needed.	The WIOA required measures include post-program measures for specific programs, including VR. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Ensure the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and work to ensure people with disabilities have the chance to become future scientists, engineers, and mathematicians. Partnerships should be created with federal contractors who have 503 requirements and talent shortages.	There is ongoing work to connect workforce system with STEM. This is outside the scope of the plan at this time. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Focus on Sector Strategies to Get More PWDs Employed. Ensuring that such economic growth doesn’t leave people with disabilities behind requires the focused attention and dedicated effort of Oregon’s workforce system.	Sector Strategies are being considered when working with VR clients as part of their employment goal development process. More details can be found in Section VI.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	We submit that most of these are job sectors where people with disabilities can excel and benefit their employer’s bottom line. As example of how Oregon can do this, we would recommend that Oregon look at disability employment programs that have helped hotels and resorts meet their talent needs in other states. The Oregon Board, along with other components of the workforce system,	VR contractors are trained to present the business case to employers when doing individualized placement activities. The business case is being presented to potential employers as we interact with employers regarding 503, sector strategies, etc. We do not believe that VR should strive to place more individuals in the

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		should connect with employers in the hospitality sector to begin figuring out how to benefit from these models.	service industry and instead believe that we should be focusing on higher demand, higher skill, and therefore higher wage opportunities. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Improve School to Work Transitions for Youth with Disabilities – Including on disability employment programs in Hotels, Hospitals, and Elder Care Facilities. There is a significant need for the State of Oregon to expand Project Search to train, prepare, and transition more young people with disabilities into the workforce.	While the service industry does provide opportunities for individuals with disabilities and is actively pursued when that is the client’s choice, we are cautious that we do not exclude other employment opportunities for our clients. Project Search is currently being reviewed by the partnership (VR, ODDS, ODE) to examine its potential effectiveness. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Avoid the Opportunity Costs of Focusing on Bricks and Mortar One-Stop Centers /American Job Centers. Many Should be Mobile and All Services Online. The State Plan should look to innovate beyond simply co-locating services and supports at the One-Stop Centers in Oregon. Focusing exhaustively on One-Stop Centers, physical infrastructure, and co-locating services comes at the opportunity cost of losing the chance to improve supports and increase outcomes.	Thank you for your comment. The workforce system will continue to explore ways to create a customer-centric, effective, easy to access and simple to understand workforce system as stated in Goal 1. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Overcome the gap between disability services and career services in Secondary Education. The issue we have in mind is the fundamental disconnect in most post-secondary education programs between disability services and careers. There is a historic opportunity to bridge this gap and to improve career and technical education for young people with and without differences. The disconnect between disability and career services has to be solved. The solution depends on collaboration between OWIB and HECC.	Thank you for your comment. We agree this is important and is an issue we feel the plan gives us leeway to work on. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of	Section III	We strongly emphasize to the Oregon Workforce Investment Board to consider the vital opportunity that apprenticeship training and credentialing can offer to young people with disabilities in Oregon. At a minimum, people	Where appropriate, apprenticeship is discussed and pursued with interested VR participants. The Bureau of Labor and Industries (BOLI) is at the table at many local boards and associated

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Respectability		with disabilities should be identified as a group to be reached with information and resources about work based training. Further, we direct OWIB and OED to the work being done by the Office of Disability Employment Policy at the federal level.	LLT's and there is an initiative with DHS to strengthen relationships with the BOLI and the employers who have apprenticeship programs. Local education entities are also engaged when apprenticeship opportunities are pursued. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	VR Innovations - Prioritize pre-employment training expand partnerships with VR. The school system, vocational rehabilitation, and local workforce boards should be encouraged to build creative, collaborative partnerships with companies that are leading in the disability space such as Amazon, UPS, and Pepsi.	WIOA requirements regarding funding for PETS is fully embraced and Oregon VR program is working with schools, and Workforce Partners to take the opportunity to prepare disabled youth in school to enter the workforce. Where there are opportunities to pursue employment and relationships with employers who are advanced in the realm of disability, they are being pursued at a local level as well as at an administrative level. At the administrative level, relationships are being forged and developed with leading companies to help them message to their local entities. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	To begin with, we would highly recommend that the Oregon Workforce Investment Board examine how to support disability employment efforts through establishment of public/private partnerships in local communities.	Local workforce partnerships are being identified and developed. Due to the diversity of the state's economy, this will appear very different across the state. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Effective employer engagement depends on having the right partnerships, using the right language, and focusing on the right business audience. There is a critical need to involve the affiliate chapter of the United State Business Leadership Network. Based in the Portland metro area, USBLN's Oregon affiliate is —a local educational organization focused on helping —employers learn how to leverage their organizations for success in terms of recruiting, hiring, and retaining employees with disabilities. The Portland BLN represents the very stakeholders discussed in the Unified	Thank you for your suggestion. Local workforce partnerships are being identified and developed. Due to the diversity of the state's economy, this will appear very different across the state. No change to document.

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		State Plan and it needs to be part of this employer engagement process.	
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	Emphasize the business case for hiring people with disabilities again and again for a simple reason. Government action alone--even through vocation rehabilitation -- is insufficient to improve employment outcomes for Oregonians with disabilities.	Strategies for outreach and engagement to business are included in the plan. No change to document.
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section III	People with disabilities are can be ideal talent as Oregon's population ages and Baby Boomers leave gaps in the workforce. Many of the sectors projected to undergo significant growth are the kinds of job sectors where people with disabilities, with appropriate training and early work experiences, can succeed. As demand for health care grows and more aging Americans exit the workforce, RespectAbility submits that people with disabilities are a natural labor resource that should be tapped to meet these economic trends.	When a connection and is observed and an interest expressed by a VR client coincides with opportunities for employment in areas where retirements are creating openings, VR works with individuals to pursue these opportunities and works with local sector partnerships to help meet the need in those areas and to give clients the opportunity to be employed in that sector.
Section VI: Program Specific Requirements for Core Programs			
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section VI	To support innovation and expand opportunity, Oregon's VR system should look at connecting with private-sector and philanthropic resources to complement public-sector funding with short-term pilots, innovative ideas, or evaluations and studies.	VR does pursue these opportunities and hopes to continue to create more of these relationships, including: The Summer Leadership Academy received a \$20,000 grant from Maybelle Clark Macdonald fund in 2015 and now we have a \$40,000 application into the State Park System to run the program in 2016 in addition to the VR funding. Another highlight is that Youth Transition Program has received \$57,173.00 to date from the Oregon Masonic Charitable Foundation to support our program and our Transition Specialists. No change to document.

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Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section VI	<p><i>Lane v. Brown</i> is a ground-breaking case. It is the first class action lawsuit to challenge subminimum wages of those with I/DD, and in doing so, establishes a precedent for I/DD advocacy. Oregon, by June 2017, plans to decrease time in sheltered workshops by nearly 30%, and by June 2022, will ensure that 1,115 people with I/DD at sheltered workshops will transition to non-sheltered environments. This case has important implications for Oregon moving forward and yet it is not mentioned at all in the current draft of the Unified State Plan. We raise this issue because this case gives Oregon the opportunity to prioritize competitive, integrated employment moving forward and to invest heavily in improving school to work transitions for youth intellectual and developmental disabilities.</p>	<p>The terms of the Lane v Brown settlement agreement are being implemented in collaboration with the DHS Office of Developmental Disability Services (ODDS) and ODE. No change to document.</p>
Philip Pauli and Jennifer Laszlo, on behalf of Respectability	Section VI	<p>At a minimum, the VR sections of the Unified State Plan should be amended to ensure that Title IV Program staff members are fully trained in all 503 regulations.</p>	<p>Program Staff as part of the Comprehensive System of Personnel Development (CSPD) are introduced to 503 requirements. At an administrative level, VR is developing an administrative approach to meeting employers' needs as part of the VR employer engagement goals. No change to document.</p>