TAP 2020 Update – March Regular Meeting

PRESENTER: Eleni Papadakis **BOARD MEETING DATE: 3/11/2020**

BOARD MEMBER SPONSOR: Perry England **DISCUSSION TIME ALLOTTED: 1 hour**

ISSUE/SITUATION: Concise - 1 or 2 sentences that get to the heart of the situation, problem or opportunity being addressed.	**THE ISSUE/OPPORTUNITY IS:** 1) Board members will hear about the public comments received on the 2020 update to *Talent and Prosperity for All*, including the Perkins Plan component; 2) Board members will be asked to authorize staff to transmit the plan to the Governor for review and to complete plan entry into the federal submission portal; 3) Board members will be asked to charge an interagency, multi-stakeholder workgroup to develop recommendations on uses of Perkins funding in future years, as described below.
TAP STRATEGIC PRIORITY: Which TAP strategic priority or priorities does this recommendation support? Can you tie to specific goals and objectives in TAP? Briefly describe these connections. If the connection is unclear, describe why this is of consequence to the Workforce Board and/or workforce system.	**SUPPORTS TAP STRATEGIC PRIORITY:** The four strategic priorities in TAP have remained consistent since 2016: integrating service delivery; strengthening business engagement; increasing access to services for all; and ensuring performance accountability. This updated version of TAP reflects the Board's direction to "stay the course" on these priorities and the underlying goals while the Board examines its role and priorities within the state's workforce system over the coming year in its 360-degree evaluation.
POTENTIAL IMPACT: Effect on people, businesses, communities. What is better or different from other existing strategies?	**IT IS SIGNIFICANT BECAUSE:** The 2020 TAP Plan is an opportunity to recommit to goals we believe as a system will change outcomes for jobseekers and employers, or to revise or eliminate priorities that the Board no longer feels are an effective prescription for the system today.
OPTIMAL NEXT STEPS: What do you really want to happen as a result of this discussion with the Workforce Board?	**MY IDEAL OUTCOME OF THIS DISCUSSION IS:** The Board will: (1) Authorize staff to finalize plan submission before the end of March in the federal plan submission portal and vote to transmit the plan to the Governor. (2) Charge a workgroup with developing recommendations on using Perkins funds in future years as described. The Board should also determine which stakeholders beyond the administrative agencies should participate in the conversation, the

	intensity with which Board members would like to personally be engaged, and the frequency the Board would like to receive periodic updates on the workgroup's progress.
BACKGROUND: Short history of how this recommendation came to be. What has been tried, to what result? What evidence exists to support this recommendation?	**<u>Board Packet Materials</u>** Your Board packet contains the following materials for this meeting: 1. A matrix of comments received on the TAP plan and its partner-plan sections. 2. Two motions for the Board's consideration: to transmit the TAP plan to the Governor's Office and authorize staff to submit the plan in advance of April 1, and to charge an interagency workgroup to develop proposals and recommendations to the Board on setting priorities and allocating Perkins funds in future years. **<u>TAP Plan Update</u>** *TAP 2020* is split into three portions for ease of navigation: Strategic; Operational; and Partner Plans. 1. The **Strategic** portion of the plan outlines the state's vision and goals for the workforce system, encompassing the Board's four strategic priorities. It also contains a "snapshot" of economic conditions in Washington, updated to reflect today's economy, and identifies the demographics and components of the workforce system. 2. The **Operational** portion of the plan outlines how the state's workforce system partners will align behind the strategic goals and coordinate services to jobseekers and employers. Partners must also address how educational institutions and economic development organizations will be engaged in the workforce system, among other details of service integration. 3. The **Partner-Plan** portion of TAP pulls together the individual operating plans of each partner program within TAP. Following the January Board meeting, staff released TAP for 30 days of required public comment, which closed on March 3. Staff received submissions from approximately a dozen entities, including some partner agencies responding to their respective portions of the plan. Of the comments received, most suggested typographical fixes to sections of the plan, or standardized the usage of terms of art like "registered apprenticeship" throughout the plan. Other submissions offered questions on specific portions of the plan instead of comment; these submissions have been forwarded to the relevant partner agency staff for response. A final category of submissions included two form letters from national advocacy groups urging Washington to incorporate pay-for-performance principles into contracting whenever possible, a practice already required by Governor's Executive Order for several years. A matrix summarizing comments received and how they have been addressed in the plan is included in your Board packet. All three portions of the plan, as updated following the public comment period which closed on March 3, are available for downloading and review at: https://www.wtb.wa.gov/wp-content/uploads/2020/03/TAP-Update-2020-030420.pdf **<u>Perkins V Plan Update</u>**

	The Board will specifically be asked to approve the Perkins V state plan integrated into TAP for federal submission, and to charge an interagency and/or multi-stakeholder workgroup to develop Perkins funding rules and recommendations for consideration by the Board in future years. A link to the Perkins V plan, as updated after the public comment period which ended March 3, can be found here: https://www.wtb.wa.gov/wp-content/uploads/2020/03/Perkins-V-Plan-WA-030420.pdf ***Perkins Funding Workgroup*** At the January Board meeting, staff from the Office of Superintendent of Public Instruction (OSPI), the State Board for Community and Technical Colleges (SBCTC), and the Workforce Board recommended that the Board jointly establish a workgroup to develop proposals for any change in the basic grant split for future years' funding based on a data analysis that looks at the quantitative effects of adjusting the split *and* to refine recommendations to strategically leverage leadership, administrative, and reserve funds to build system capacity. Even in the event the workgroup recommends to the Workforce Board that the basic grant split be maintained at 56/44, partners will develop a rationale and "business rules" that specify the reasons for maintaining the split level and criteria for adjusting it in the future. The workgroup will be made up-- at a minimum--of representatives from OSPI, the Workforce Board, and SBCTC. However, the Workforce Board may elect to include other stakeholders as mandatory participants, and encourages broad stakeholder engagement. Analysis of the split and creation of a "business rules" manual will take into account, at a minimum: FTE/headcounts for CTE students served at both secondary and postsecondary; CTE revenue; current CTE investments; and the impact of changes on sub-recipients, especially rural institutions. The workgroup will meet between March and September 30, 2020 and will report to the Workforce Board their recommendations for the next years' split, their rationale and criteria for future split discussions, and recommendations for strategically leveraging leadership and reserve funds at a fall meeting of the Workforce Board.
STAKEHOLDER ENGAGEMENT, PROS AND CONS: Which stakeholders have been engaged in the development of this recommendation? What are the pros and cons of recommendation? According to whom (which stakeholder groups)? Are there viable alternatives to consider?	**STAKEHOLDERS HAVE PROVIDED INPUT AND THEY THINK:** Partners have updated their respective portions of the operational and partner-plan portions of TAP. The Washington Workforce Association also provided comments on the strategic portion of the plan. These comments have been addressed or integrated in the course of staff edits.

FINANCIAL ANALYSIS AND IMPACT: What will it cost to enact this recommendation? What resources will be used? Are new resources required? How much? Where will existing or new resources come from? Are there savings to be gained from this investment? Over what period? Are there other returns on investment to consider?	**THE COST AND RESOURCE NEEDS OF THIS RECOMMENDATION ARE:** n/a
RECOMMENDATION AND NEXT STEPS: What specific result do you want from the Board? Is this recommendation for discussion or action? If for discussion, will action be required at a later date? What next steps are expected after this discussion?	**THE RECOMMENDATION AND/OR REQUESTED ACTION IS:** 1. The Board will authorize staff to finalize plan submission before the end of March in the federal plan submission portal and vote to transmit the plan to the Governor; 2. The Board will charge a Perkins Funding Workgroup to develop recommendations for future uses of Perkins funds as described above.

RECOMMENDED MOTION CHARGING THE INTERAGENCY WORKGROUP ON PERKINS FUNDING

WHEREAS, the Workforce Training and Education Coordinating Board (Workforce Board) is the state board for vocational education; and

WHEREAS, the Workforce Board is designated by the Governor and Legislature to oversee funds received by Washington State through the federal Carl D. Perkins Strengthening Career and Technical Education (CTE) for the 21st Century Act of 2018 (Perkins V); and

WHEREAS, the Workforce Board works in close partnership with the Office of Superintendent of Public Instruction (OSPI) and the State Board for Community and Technical Colleges (SBCTC) to identify opportunities to align efforts across agencies to support students engaged in career and technical education across the state;

THEREFORE, BE IT RESOLVED, the Workforce Board charges an interagency workgroup to develop Perkins funding rules and recommendations for consideration by the Board in future years; and

BE IT FURTHER RESOLVED, the workgroup will, at minimum, consist of representatives from the Workforce Board staff, OSPI, and SBCTC, but may contain additional members, including business and labor members, at the direction of the Workforce Board; and

BE IT FURTHER RESOLVED, the interagency workgroup will develop proposals for the Workforce Board's consideration on any changes in the split of Perkins Basic Grant funds in future years, based on a data analysis that looks at the quantitative effects of adjusting the split; and

BE IT FURTHER RESOLVED, the workgroup will additionally develop recommendations to strategically leverage leadership, administrative, and reserve funds to build system capacity for the review and consideration of the Workforce Board; and

BE IT FURTHER RESOLVED, the workgroup will provide periodic reports to the Workforce Board on its progress, and will deliver to the Workforce Board a final list of recommendations for Perkins V funding uses in the next program year by September 2020.

RECOMMENDED MOTION FOR TAP PLAN APPROVAL

WHEREAS, Washington State statute requires the Workforce Training and Education Coordinating Board (Workforce Board) to develop a state strategic plan for the workforce development system; and

WHEREAS, the Workforce Board identified four key strategic priorities that will provide guidance for improvement of the state's workforce system, and

WHEREAS, there has been broad stakeholder input throughout development of the state plan; now

THEREFORE, BE IT RESOLVED, the Workforce Board approves the plan, *Talent and Prosperity for All: The Strategic Plan for Unlocking Washington's Workforce Potential*; and

BE IT FURTHER RESOLVED, the Workforce Board directs the state workforce plan to be forwarded to the Governor for signature and for Legislative resolution; and

BE IT FURTHER RESOLVED, the Workforce Board approves the state workforce plan be submitted to the federal Departments of Labor and Education as the state's plan under the Workforce Innovation and Opportunity Act and the Carl D. Perkins Strengthening Career and Technical Education (CTE) for the 21st Century Act of 2018 (Perkins V).

Workforce Training & Education Coordinating Board

PUBLIC COMMENTS RECEIVED ON *TALENT AND PROSPERITY FOR ALL* – UPDATED 3/4/20

Comment By:	Section/Page No.	Comment	Resolution
Jody Robbins, Dept. of Labor & Industries (Apprenticeship Section)	Strategic Section: "Apprenticeships", Pg. 23	I would simply ask that you be consistent in your reference to Apprenticeship by using the appropriate phrasing "registered apprenticeship". This is especially critical at this point in history where the national administration is trying to weaken registered apprenticeship rules. I believe our governor is clear when he says "if we are doing apprenticeship in Washington, it is registered apprenticeship". Additionally, the report references "pre-apprentice" or "pre-apprenticeship" and should be using the phrase "Apprenticeship Preparation". This may seem like a small thing but the phrase I reference is consistent with The Washington State Apprenticeship & Training Council's policy and practice for formal recognition. Pre-Apprentice is shown to give folks the wrong impression regarding program outcomes – when one is a "pre-apprentice", one would reasonably expect to be an apprentice one day soon. A "preparatory" student is just that, one who is preparing for entry into a highly competitive opportunity – that is Registered Apprenticeship. Our State Apprenticeship Council is clear on this terminology and we would appreciate your help in this endeavor. It also appears that you have a broken link "American Apprenticeship Initiative" on page 23. Not sure where you were trying to go but I don't think L&I has anything to land to in regards to the AAI grant . . .	• Standardized references to "apprenticeship" throughout to "registered apprenticeship." • Removed and updated reference to "pre-apprenticeship" as suggested. • Removed broken hyperlink.
RaeLyn Auxlund McBride, Exec Director Institutional Planning & Advancement	Performance Indicators Pgs. 78-79	**1P1 job placement rate** The target (5% increase from 40% to 45%) seems ambitious. The two years prior to the 2017-18 rate were 35% and 36% respectively. The 2017-18 40% rate could be a bit of a high – we wonder if 2018-19 the rate might go back down again. Additionally, it is likely that we will go through a recession before this next timeframe is completed (2021-24) and, if we do, we wonder if the employment rate will have recovered to the extent to reach 45% by 2024.	• Forwarded to OSPI to draft a response based on the methodology applied to choose the performance targets.

		2P1 credential rate This target also seems a bit ambitious. The rate was 49% in 2015-16 and 2016-17, and then jumped to 55% in 2017-18. Is it reasonable to expect an 8 percentage point increase from 2016-17 to 2021-22 and a 12 percentage point increase from 2016-17 to 2023-24?	
Erik Karl Tingelstad, EdD Dean for Student Learning Cascadia College	Post-Secondary Providers	My question is regarding the Post-Secondary providers, Washington's Community and Technical Colleges. If one of the 34 current community and technical colleges doesn't meet the eligibility criteria to receive Perkins funding, can there be an exception process created to allow that college to submit a plan and become a post-secondary provider similar to what exists for secondary providers?	• Forwarded to SBCTC for response. Not a comment to the substance of the plan.
Lauren Hadley, Director of Employer Engagement Acting Director of Advanced Manufacturing Workforce/STEM **Shoreline Community College**	Overall document, Perkins Plan	Please see attachment .	• Integrated various typographical edits to the Perkins Plan.
Maria J. Posey, Director Third Sector Capital Partners		*We encourage Washington to consider incorporating a reference to the pay-for-performance provision in WIOA (§683.500 Subpart E) in its state plan as a way in which WDBs can leverage the potential of outcomes payments to better serve disadvantaged populations such as justice-involved, disabled, young parents, former foster care, historically marginalized and very low income groups.* *Through House Bill 1661, Washington is already leading the country in using performance-based contracting (PBC) to*	• Workforce Board staff is drafting a response letter noting how pay-for-performance contracting principles are currently adopted in the workforce system.

		transition ~$1 billion across 1000 social service contracts to be performance-based. Within the newly created Department of Children, Youth, and Families (DCYF) contracts with service providers are now required to use a data-informed, outcomes-oriented approach that incentivizes providers to reach more disadvantaged populations and work together to holistically serve children, youth and families. WIOA's pay for performance provision has the potential to do the same in the workforce space. The provision allows workforce boards to leverage federal funding to make outcomes-based payments based on providers reaching performance milestones. Other states including California and Virginia have already taken advantage of the pay for performance provisions and were able to increase the number of at-risk populations successfully enrolled and matriculating in workforce programs by 500%.	
Washington State Department of Social & Health Services	DSHS Staff	Please see attachment.	• Integrated various typographical edits to the BFET and TANF Plans.
Jon DeVaney President, WA State Tree Fruit Association	Assessment of Need, Pg. 223 (5)(A) Range of Employment and Training Services to the agricultural community	*One of the greatest challenges in assessing the size of the seasonal agricultural workforce is that this is not a static population. Agricultural employers report that in a robust economy such as we have now more agricultural workers will take employment in other industries, which may offer year-round employment or other potentially desirable characteristics and opportunities. In fulfilling its function to make all training and job placement services available to farmworkers, the office of the State Monitor Advocate is well-positioned to collect and report information on how many agricultural workers may be changing industries and the factors that may be attracting some members of this workforce to consider jobs outside of agriculture. This information would be useful to employers seeking to attract and retain experienced workers in agriculture, and also for employers and policy-makers attempting to assess the*	• Forwarded along to the Agricultural Outreach Plan team at ESD to draft a response. No update to plan necessary; not a substantive comment on the text.

		growing shortage of domestic farmworkers.	
Roger Low Policy Director, America Forward Coalition	Equity	*At a time when major disparities and inequities persist in employment and wage data, especially for people of color, we urge Washington to ensure its final Workforce Innovation and Opportunity Act (WIOA) state plan focuses attention and resources on improving measurable outcomes for opportunity youth, Washingtonians of color, and individuals and families near or below the poverty line.* *Washington's final state workforce plan should consider strategies to invest WIOA resources in building evidence, and linking dollars to these key measurable outcomes. In particular, we urge you to consider strategies to budget and procure in a manner that considers a provider's evidentiary track record, using rigorous statistical tools and previous impact evaluations. These processes should also favor providers that are currently in the process of actively leveraging administrative data to measure results and build evidence for their programs.* *We also encourage you in particular to work with Local Workforce Development Boards (LWDBs) across the state to consider leveraging innovative pay-for-performance provisions in WIOA, including in particular pay-for-performance contracts defined and enumerated in §683.500 through §683.540 of the legislation. These provisions, which to our knowledge no LWDB or entity receiving WIOA funds has yet utilized in a contract in Washington, allows a LWDB to use up to ten percent of their adult, youth and/or dislocated worker WIOA allocations to enter into outcome-based payment contracts. The legislation also stipulates that "Funds used to carry out pay-for-performance contract strategies by local areas shall remain available until expended."* *LWDBs in Virginia and California have launched pay-for-performance contracts using this provision, and in so doing*	• Workforce Board staff is drafting a response letter noting how pay-for-performance contracting principles are currently adopted in the workforce system.

		substantially increased the number of at-risk individuals enrolled in workforce programs. While the Department of Labor has been slow to release guidance on the implementation of this provision, we expect the Department to issue clarifying guidance very soon, clearing the way for outcomes-based contracts to scale. Meanwhile, we urge you to reference the promise of the pay-for-performance provision, and the value more generally of linking WIOA funds to wage and employment outcomes, including as a strategy to increase equity, in your final state plan.	
Ronald Mayberry, Director of Career & College Readiness, Bethel SD	Measurement Options 5S3, Pgs. 76-77	Please see attachment.	• Forwarded to OSPI to draft a response based on the methodology applied to choose the performance targets.
Amy Koehl Vice President, Employee and Community Services The Lighthouse for the Blind	General, WIOA Final Rule, Advisory Committee, Cooperative Agreement arrangement, DSB, qualifications & NIB	Please see attachment.	• Forwarded to Department of Services for the Blind for response.

Washington State Perkins Plan Feedback
Lauren Hadley
lhadley@shoreline.edu

Overall document comments

- Spacing in inconsistent
- Use of State is inconsistent – APA style would dictate state is only capitalized when part of a formal title, referring to the state of Washington would not apply in this case
- The CLNA consistently uses the term CTE. This document interchanges CTE and professional technical education. Is that what is wanted?
- Apprenticeship is typically singular even when referring to more than one apprenticeship. Several uses of the work apprenticeships is used throughout the document.

Section	Page #	Comment
122 (d) (1)	7	*First bullet, top of page* Define LWDB *Bulleted list CTE (OSPI)* A bullet covering CTE dual credit should be added
122 (d) (1)	8	*Bulleted list Workforce (SBCTC)* A bullet about in-demand programs and their alignment with industry should be added *A comment on Tim McClaine's note* I agree this should be fleshed out and expand on what is meant by "myriad"
122 (d) (2)	8	*Paragraph one* Specify which on of the state's TAP plan goals
122 (d) (2)	9	*Middle of page, paragraph beginning with "Under"* "Occupations including apprenticeships" – apprenticeship isn't an occupation, it is a method of education and training
122 (d) (2)	10	*Second line on page* Using the phrase manufacturing and advanced manufacturing is duplicative, remove the words "manufacturing and"
122 (d) (4) (A)	12	*Second paragraph, line two* "programs program" What is trying to be said here?
122 (d) (4) (A)	12	*Fourth paragraph* Last two sentences begin with "in cooperation with SBCTC" – this phrasing is awkward
122 (d) (4) (B)	13	*Plan Content* Section is not complete, it ends with 132 will -
122 (d) (4) (B)	14	*First paragraph* The sentence beginning with "The system will" needs more punctuation of a bulleted list The second sentence starts "The extended leadership" with the extra space it infers there is a leadership of something that will do some sort of work

		Do you want to specify that it is the program advisory committee that will provide approval? Last sentence is confusing. *Third paragraph, last line* The term vocational is used, should it be updated to CTE? *Fourth paragraph* Should it be clarified that Perkins dollars do not support BAS degrees?
122(d) (4)(B)(i)	16	*Bulleted list* First two bullets are the same, bullets 3 – 6 are the same *Last paragraph* In this paragraph the term Perkins V is used for the first time. Should this be consistent throughout the document?
122 (d)(4)(C)(i)	21	*Fourth paragraph, fourth line from the end* "implementing high quality" the thought ends, high quality what?
122 (d)(4)(C)(iv)	26	*Second paragraph, third line* The word reviews needs an apostrophe
122 (d)(4)(C)(v)	27	I agree with Tim McClain's comments in this section.
122 (d)(4)(C)(vi)	27	*Plan Content* Section is not complete, it ends with "activities; and"
122 (d)(4)(C)(vi)	28	*Third paragraph* Last word, "obtainment" is in a different font
122 (d)(6)	36	*Last paragraph of section* Spell out BEdA's
122 (d)(7)	37	*Part B comment* It would be nice to use these funds to identify proven strategies that educators can implement.
122 (d)(8)(A)	39	*First full paragraph* This is the first-time background information is presented in this document. Include this information as part of a footnote if needed, not a part of The Plan.
122 (d)(9)(A)	40	*Last paragraph of Plan Content* Is a poster going to move the needle? I have not seen it work for Washington Women in the Trades. Couldn't a recommendation that all collateral include non-traditional participants, and then use this money to research best practices.
122 (d)(9)(A)	41	*First paragraph* This paragraph includes a list of monitoring activities that appear multiple times throughout the document. Can it appear once as monitoring activities, an then refer back to it as needed? *Third paragraph - $13/hr* Why is minimum wage the approved amount when we know this is not a living wage, let alone a family wage?
122 (d)(9)(C)	43	*Secondary, first bullet* What is LEA?
122(d)(9)(D)	45	*Secondary*

		Second sentence should end with “school districts must provide evidence of services provided to schools,” not provided to school districts
122 (d)(9)(E)	47	*Plan Content* There is an unexplained dash after “populations”
122 (d)(9)(E)	47	*Second paragraph* I would like to see more examples here other than just registered apprenticeship
122 (d)(10)	48	*Last paragraph* 3S1 and 1P1 – A definition of these indicators would be nice like was done earlier.
122 (d)(10)	49	*Continuation from page 48* I am fully in favor of an expanded definition of “non-traditional” beyond gender *Paragraph two, Secondary* Does a high school take four semesters to be a concentrator? Not all CTE courses are a full year, does that mean some students take 2.5 credits?
122 (d)(14)	53	*Scope* The entire document puts secondary before post-secondary, the order of this section should be For all applications, secondary, post-secondary
131 (g)	56	*Last paragraph before chart* “district that **their** physically” should read “district that **they are** physically”
132 (a)	61	There are two number “1s”
132 (a)	62	*Postsecondary* The plan says that the percentage is calculated from the number of students with a workforce education intent code. Is this workforce, as in qualified for workforce funding because the industry is in high demand, or using workforce and professional technical synonymously? Not all professional technical programs are eligible for workforce funded student. This should be clarified.

Washington State Department of Social & Health Services

DSHS/Economic Services Administration, Community Services Division

WIOA Combined State Plan – TAP - Public Comment

1. **TANF and BFET:** Please review and provide comments examining how TANF and BFET, ***as voluntary WIOA Combined Plan partner programs***, align (or potentially conflict) in terms of program specific activities, measurements, and outcomes. Also include any areas where you see there being potential impacts (positive or negative) on customers, services, processes, etc.

2. **Food Policy, Social Services, and additional reviewers:** Please review and provide comments regarding potential impacts (positive or negative) to program participants, services, processes, or outcomes, etc.

February 26, 2020

Name/email	Comment (conflicts, challenges, questions) ***These should be items you want the Board staff and/or relevant plan partners to know and respond to***	Reference ***(cite page, section, subsection, etc.)***
Susan Kavanaugh kavansg@dshs.wa.gov	Recommend adding a table of contents and sections for clarity of organization and ease of review and reference of this 588 page document.	New page 2
Ellen Nolan enolan@dshs.wa.gov	For respectful/modern language, change references from 'food stamps' to Supplemental Nutrition Assistance Program or food assistance	Page 30 - SNAP
Ellen Nolan enolan@dshs.wa.gov	Are there definitions somewhere for "low income" individuals and "homeless" individuals for the targeted populations? Are these agreed upon terms somewhere in the plan? Might be good to footnote	P. 53
Ellen Nolan enolan@dshs.wa.gov	It isn't clear where there is a reference to using the Washington Connection portal for an eligibility assessment, what will be assessed – just eligibility for public assistance and TANF? What is the expectation?	P. 58 references to Washington Connection eligibility assessment
Ellen Nolan enolan@dshs.wa.gov	If some of the legislation in the 2020 session changes time limits, or WPR change with the current federal administration, this section may need to be addressed.	P.409

Washington State Department of Social & Health Services

Susan Kavanaugh kavansg@dshs.wa.gov	The proposed legislation impacts TANF time limits and WorkFirst sanction policy. I think the language on page 409 is likely broad enough to encompass these changes.	
Ellen Nolan enolan@dshs.wa.gov Susan Kavanaugh kavansg@dshs.wa.gov	If the current administration, when TANF expires May 20, 2020, makes any changes to how MOE may be spent/counted, this section may need to be reviewed Agreed, though correct for now and continuing resolution likely. Administration has issued a notice of intent to propose rulemaking on this issue, but no actual rule change proposed.	P. 415
Ellen Nolan enolan@dshs.wa.gov	Not sure if this took into account the new rule that significantly will increase the number of ABAWDS required to work effective April 1, 2020.	P. 429 funds for ABAWDS
Sanela Maksic maksisn@dshs.wa.gov	The last sentence of the paragraph – "DHS/DVR will take an active role in helping all one-stop partners…" The reference was made to the Department of Social and Health Services, but 'DHS' abbreviation utilized – not sure if this was an error.	Pg. 72 Intake:
Sanela Maksic maksisn@dshs.wa.gov	The implementation of the Order of Selection is a positive impact on the Aged, Blind, or Disabled (ABD) participants; prioritizing services for individuals with the *most significant disabilities.*	Pg. 305-307
Sanela Maksic maksisn@dshs.wa.gov	The first pg. 167 is out of sequence, not sure if intentional; the pages are off. After *1st* pg. 167 it goes to pg. 138 – *(3) State Program and State Board Overview*, making the *style* out of the sequence. [(9) … (3)].	Pg. 167
Sanela Maksic maksisn@dshs.wa.gov	a. 1% of the allocation to serve individuals in state correctional institutions, juvenile justice facilities, and educational institutions that serve individuals with disabilities. Is there a plan/strategy for how the State will engage with education institutions that serve individuals with disabilities? Will the educational institutions provide pre-employment	State leadership funds under section 124(a)

Washington State Department of Social & Health Services

	transition services? How will the outcomes be measured?	
Sanela Maksic maksisn@dshs.wa.gov	Through continued collaboration, innovative approaches, and the use of natural supports many individuals with disabilities would benefit from supported employment- this is a positive impact to (ABD) recipients who want to work with DVR and qualify for services (as one of the targeted populations).	
Sanela Maksic maksisn@dshs.wa.gov	What is the % allocated to *the supported employment* that must be focused on adults with the *most significant disabilities?*	
Susan Kavanaugh kavansg@dshs.wa.gov	I may have missed it, but don't see reference, except in reference to older workers in SCSEP, to how the workforce development system will address occupations that are both societally necessary (high demand) and low wage. Examples: caregivers for the elderly and disabled, child care providers. Suggest acknowledging this difficult issue.	Strategic elements section? Pages 4-5 or pages 8-9 under weaknesses?
Susan Kavanaugh kavansg@dshs.wa.gov	Clarify reference to TANF recipients: Delete "Individuals with Two Years of Exhausted TANF Eligibility" and replace with "Individuals who have used 2+ of their 5 years of TANF eligibility"	Page 24 and page 53
Susan Kavanaugh kavansg@dshs.wa.gov	Supported employment – may want to reference TANF involvement with HCA/BHA on referrals to supported employment services for TANF recipients. Questions: contract Tarimah Williams at CSD	Supported employment services and systems page 306

Sathe, Pranaya (WTB)

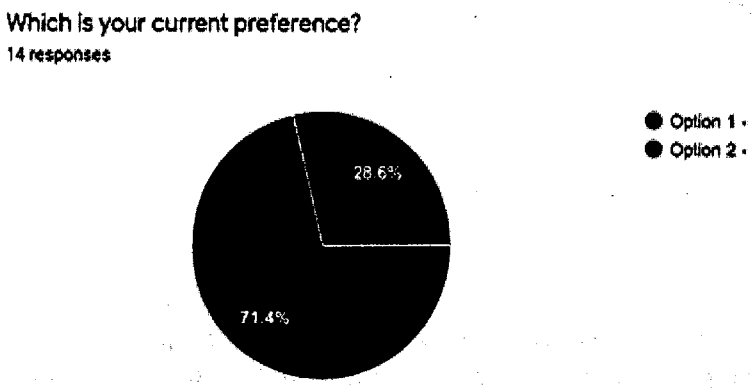
From: WTB-Workforce (WTB)
Sent: Tuesday, March 3, 2020 8:32 AM
To: Sathe, Pranaya (WTB)
Subject: FW: Feedback on Perkins V Measurement 5S3 Option 1 or 2

From: RONALD MAYBERRY [mailto:rmayberry@bethelsd.org]
Sent: Monday, March 2, 2020 5:51 PM
To: Papadakis, Eleni (WTB); Wallace, Becky; WTB-Workforce (WTB); Wolf, Eric (WTB); Clarisse Leong
Cc: MICHELLE CHANEY; MICHAEL CHRISTIANSON; MICHELLE LEDBETTER; JOHN PAGE; Maija Thiel; Sly Boskovich; Matt Carlson; Kelly Powell; Michelle Lewis; Katie Redmond; Diane Carver; oneille@psd401.net; Amy Miller; Cynthia Hoeft
Subject: Feedback on Perkins V Measurement 5S3 Option 1 or 2

We appreciate the opportunity to provide feedback specifically on the measurement options for 5S3. Pages 76-77 of the https://www.wtb.wa.gov/wp-content/uploads/2020/02/Perkins-V-Plan-for-Public-Comments-02032020.pdf document.

Our Pierce County WACTA group conducted a survey of our membership on the Perkins V Measurement 5S3 Option 1 or 2. We had 14 members which includes the Pierce County Skills Center for a total of 13 districts provide feedback via a survey tool.

Of the two available options we had 71.43% preferred Option 1:



We also collected feedback on the suggested measurements within each option.

Option 1:

Cooperative and instructional work-based learning are not currently supported in my district. I don't know what the future holds for those opportunities.

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There is ambiguity in terminology of both options. Example: what constituters career awareness? (any CTE class). Not sure if we should be asking "could" we document, or "should" we document. With $ and people, we can do a lot of these things. I'm not getting allocated more $ and people:)

****

We do not have the resources to support option 2 even at the lower target levels. We are still working to make sure the kinds of activities in option 1 are uniformly implemented.

****

There needs to be clarity around CTSO's if Option 1 is selected. There is too much overlap in my opinion is Option one is used and the requirement for separate CTSO's should be removed and consolidated into the WBL definition.

****

Option 1 is more attainable for our district

****

What I would like OSPI/PESB to consider is a more attainable way to get Career Choices and Worksite Learning endorsements. Right now, a teacher has to be fully certified which causes negative impact in a couple of ways. First, we would be pulling a fully certified teacher out of the classroom to foster worksite learning. Secondly, as we expand career-connected learning, having teachers who are conditionally certified, could not also follow kids through worksite learning if we do it by program. (I can clarify if this doesn't make sense.)

****

Option 1 is already a challenge for districts in some areas and of some sizes to meet. Option 2 would increase the inequitable financial and logistical burden for program compliance for districts and would depend on external factors/partners more than district-controlled practices/priorities.

We are at the ready to provide additional feedback in regards to our various districts and their perspective on options 1 and 2.

Sincerely,

Ron Mayberry
Director of Career & College Readiness
Bethel School District

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The Lighthouse for the Blind, Inc. would like to make comment on the following areas of the WA State Workforce Development Plan.

General comments:

- The document was challenging for those using screen readers to access it because it lacks a table of contents and reportedly jumps back to previous sections.
- Please note the pagination in the document does not match the actual document page numbers. For identifying comments, the page numbers in the document are written first, then the actual page number is noted in parentheses.

(2) Workforce Development, Education and Training Activities Analysis. The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of –
(A) The State's Workforce Development Activities. Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and mandatory and optional one-stop delivery system partners
B) The Strengths and Weaknesses of Workforce Development Activities. Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.
Page 8 (9)
"Although Washington is well respected at the federal and state levels for its coordinated, holistic
approach to workforce development, the report identified four areas of potential risk within the system
that may warrant further analysis:
• Variations in local service delivery;
• Inconsistent quality of counseling to help students transfer into training and employment;
• Variable degrees of engagement between employers and educators; and
• Federal restrictions on services particularly in TANF"

Comment: The Lighthouse for the Blind recommends adding an additional area of weakness that should be reviewed further, which includes a review of how the WIOA Final Rule is implemented in the state.
In the Preamble and Frequently Asked Questions (FAQs) of the WIOA Final Rule, there is a blanket exclusion of the AbilityOne program. The implementation of this rule makes finding a job for a person who is blind more difficult. According to a memorandum published by the National Association for Employment for People Who Are Blind (NAEPB), since implementation of WIOA regulations in 2016, nationwide placements for people who are blind dropped from 11,398 in 2016 to 7,150 in 2019, according to the Department of Education. NAEPB further states that even with factoring in the increased proportion of State Rehab Agency budgets

going toward youth transition services, there is a significant reduction— 37%— in successful placements. Finally, the Rule exacerbates the problem of a lack of training by cutting off funding for training for individuals who 1) currently work at AbilityOne agencies, 2) have a goal of working at AbilityOne Agencies, or 3) who have such significant training needs in adjusting to blindness that they don't yet have an employment goal (Homemaker Exemption).

(8) Addressing the Accessibility of the One-Stop Delivery System.

Describe how the one-stop delivery system (including one-stop center operators and the onestop
delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria. (This Operational Planning element applies to core programs.)

Page 162 (193)
"Each local workforce development board will designate
either one of these existing advisory groups or create a new one to focus on barrier removal work, and
will seek to recruit members from a broad spectrum of populations with barriers to employment,
including: people with physical, sensory, behavioral health, or cognitive disabilities; economically
disadvantaged communities; low-skilled and under-educated individuals; English language acquisition or
bilingual communities; disadvantaged youth; and the long-term unemployed. Local workforce development boards are encouraged to engage with real customers with barriers, including encouraging
customers to be part of their local committees focused on barriers. "

Comment: The Lighthouse for the Blind has a particular expertise in supporting accessibility for people who are blind and DeafBlind, and would like to participate on the advisory committee with the goal of improving access for these groups, as well as sharing best practices and strategies to enhance accessibility.

(b) **Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System**. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

(1) Federal, State, and local agencies and programs;
(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;
(3) Programs carried out by the Under Secretary for Rural Development of the Department of

Agriculture;
(4) Non-educational agencies serving out-of-school youth; and
(5) State use contracting programs.
Page 239 (270)

"Agency response c.1: Federal, State, and local agencies and programs:
The Washington State Department of Services for the Blind (DSB) believes that collaboration with stakeholders is essential to assisting people with disabilities to successfully become employed. Such an ongoing effort maximizes resources and addresses the quality of life issues that can enhance the ability of a person with a disability to obtain and maintain employment…"

Comment: The Lighthouse for the Blind, Inc. would like to be considered as a partner local agency through a Cooperative Agreement arrangement. AbilityOne (see note below) agencies like ours provide many opportunities for successful employment outcomes for people who are blind and DeafBlind, and those who have additional disabilities at competitive wages and benefits. The WIOA Final Rule effectively cut off an avenue of employment that is a productive and competitive opportunity for individuals who are blind. In addition to entry level and manufacturing jobs, we offer employment opportunities in areas such as HR, Rehab, teaching, retail sales, planner/buyer, engineering, quality, IT, contract management, supervisory, as well as senior management positions.

Background on AbilityOne from National Industries for the Blind (NIB) paper presented at the National Symposium, 2019:

"The AbilityOne™ Program, authorized by the Javits-Wagner-O'Day (JWOD) Act, creates employment for people who are blind or have significant disabilities through the sale of products and services to the federal government. More than 46,000 Americans achieve economic and personal independence through this program, administered by the Committee for Purchase from People Who Are Blind or Severely Disabled (operating as the U.S. AbilityOne Commission), an independent federal agency."

Agency response c.5: State use contracting programs
None
Page 240

Comment: Although DSB does not currently have a state use contracting program, The Lighthouse for the Blind, Inc. would like to take this opportunity to ensure DSB and others are aware of the state use law currently on the books. In 2012, The Lighthouse for the Blind, Inc. reached out to state government regarding the non-utilization of the existing law for state procurement of products and services. Legislative research conducted in 2016 identified existing law RW 19.06.010 as suitable for this purpose. RCW 19.06.010 was originally passed as a permissive law using the phrase "may purchase" in March 10, 1959 and then in March 6, 1961

as directive law using the phrase "shall purchase." These laws apply to state procurement and procurements by counties, cities, school districts or other agency, political subdivision or taxing district of the state of Washington.

- RCW 19.06.010 provides blind made product labeling specifications and minimum qualifications of 75% of labor hours required for manufacture.
- RCW 19.06.020 identifies government entities required to purchase qualified blind made products and services from any nonprofit agency for the blind located within the state which manufactures or distributes blind made products PROVIDED they are equal in quality and price to those available from other sources.
- RCW 19.06.030 provide advertising limitations for blind made products to prohibit exploitation of the blind.
- RCW 19.06.040 provides for a misdemeanor penalty for vendors who falsely label blind made products.

Please note the language "blind made" is not preferred by persons who are blind and is considered archaic language. However, this is the language of the actual bill.

(i) **Statewide Assessment**.
(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:
(A) with the most significant disabilities, including their need for supported employment services;
(B) who are minorities;
(C) who have been unserved or underserved by the VR program;
(D) who have been served through other components of the statewide workforce development system; and
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(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.
(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and
(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .

Agency response (j)

Page 257-259 (288-290)

Comment:

The Agency's response states that individuals with a visual disability are employed at a rate of 47.2%, compared to 70% for all residents in the same age group in Washington state.

National Industries for the Blind (NIB) has noted that ED's rule and guidance in the WIOA preamble biases VR agencies against AbilityOne agency jobs counting as closures by essentially stating these jobs can never, or rarely ever, qualify as competitive integrated employment. However, the rule instructs state agencies to examine each employment opportunity and make determinations on a case-by-case basis. NIB further states that these conflicting approaches result in confusion and uneven compliance, and causes harm for VR clients who are blind and seeking careers that pay well and in inclusive work environments. It should also be pointed out that it is very likely that people who work for the Lighthouse for the Blind, Inc. are counted in the 47.2% of those who have a visual disability with a job.
It is our belief that people who are blind deserve to have every option available to them to become employed when that is their goal.

**The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including
DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in
the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year)
basis; however, performance metrics are collected (VETS-200 Series Reports) quarterly (using four
"rolling quarters") on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG
operates on a five-year (FY 2020-2025), multi-year grant approval cycle modified and funded annually.
In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans'
Employment and Training (ASVET) makes grant funds available for use in each State to support
Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment
Representatives (LVER), and Consolidated Veteran Service Representatives (CVSR). CVSRs are located
in rural areas. They provide DVOP services to eligible Veterans, and perform LVER duties as well. As a
condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a
grant that contains a State Plan narrative, which includes:
(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;**
To improve veterans services, LVERs and DVOPs will support improvements in their AJCs and communities where:
• LVERs work with all AJC staff to identify and increase skill development opportunities designed

to generate pathways to long-term high-wage employment for veterans who can qualify for support such as unemployment benefits while in training, the GI Bill, etc.;
• DVOPs articulate training programs to Veterans with SBEs, for alignment with military experience in order to expedite advanced placement whenever possible;
• LVERs build bridges to apprenticeship providers and advocate for placement based upon the merits veterans bring from their prior training and experience; and
As a state, our vision for the future is the well-being of veterans, transitioning service members and their families, and helping veterans with solid educational and skill development opportunities that lead to well-paying jobs. Service to veterans is an ongoing responsibility for Washington state. Employment services made possible by the Jobs for Veterans Grant are a major investment in easing the transition for returning veterans and continuing to develop civilian career opportunities for all our veterans in the 21st Century.

Page 369 (400)

Comment: The Lighthouse for the Blind, Inc. provides many opportunities for successful employment outcomes for veterans who have a visual disability. We are uniquely qualified to provide accessible work options for veterans in areas such as advanced manufacturing, professional jobs, contract management, and employment on base at Base Supply Centers, all at competitive wages and with benefits. As pointed out previously, the conflicting approaches taken on implementation of WIOA has caused harm to some who may be interested in these opportunities. By not looking at job placements individually, even those on bases do not qualify as closures under WIOA. We ask that this practice be reconsidered.

Thank you for the opportunity to review and comment on this plan.