

Public Comments/Answers for 2018 WIOA State Plan Modification (posted on 8/27/19)

	Date	Commentor	Policy Section Referenced	Comment	Response
1	9/9/19	Jerry Jones		"As described below, the State has been working since November 2017 to realign its LWDAs to be WIOA compliant by taking into consideration the factors described at WIOA Section 106(b)(1)(B), resulting in the newly designated LWDAs described below." Comment: The State has been working toward WIOA compliance but I believe the six (6) newly designated workforce areas do not comply with the remaining sections of Section 106(b)(1)(B): i. "consistent with labor market areas in the State" ii. "consistent with regional economic development areas Please explain in detail how the six (6) newly designated workforce areas in Iowa are aligned with Iowa's labor markets? Also, describe in detail how the new maps align with regional economic development areas. Details should, in fact, include details for the public record.	WIOA does not require that a local area align exactly with a labor shed or a local economic development area. Instead, it requires "considerations consisting of the extent to which the areas . . . ", which allows for a varying degree of adherence to the common labor market and economic development area factors. The State Workforce Development Board did consider these factors. Specifically, the Board was presented with multiple commuting patterns (labor shed areas, IowaWORKS membership) into each of the American Job Center offices to determine the labor market areas. The Board also reviewed the relationship between the economic development, community college, and current IWD regions/areas. In the end, the Board voted to approve a realignment map that re-drew the territorial lines of local areas in such a way that would include multiple labor markets and economic development areas in their entirety, and would not result in any of these areas being split.
2	9/9/19	Jerry Jones		"Historically, Iowa has had 15 LWDAs designated pursuant to Iowa Code Section 84B.3, in accordance with the "Special Rule Regarding Designated Areas" at WIOA Section 189(i)(1)(Exhibit 1). The 15 LWDAs date back to the Job Training Partnership Act under which States established "Service Delivery Areas" or SDAs. These SDAs were formed to align with service delivery in the State and, in Iowa, this resulted in areas that aligned exactly with community college areas throughout the State." Comment: The current 15 region map does not "align exactly with community college areas throughout the State." This is an inaccurate statement and needs to be modified.	This statement has been updated to reflect that the current 15 region map aligns "generally" with community college areas throughout the State.
3	9/9/19	Barb Francis		Concerning visits with the local boards...Questions asked by our board members were not answered & they were told that sessions would be held later to ask questions & voice concerns. The sessions were never held. On several occasions, the call-in info was changed and documents weren't provided for the reassignment meetings. No explanation was given for this.	Between December 2017 and February 2018, the State of Iowa engaged in extensive consultation with all stakeholders in the realignment process. During this time, IWD attended 13 local board meetings, which resulted in significant input to the State Workforce Development Board's Realignment Committee. The State believes it has satisfied the requirement of "consultation" set forth in 20 CFR 675.300. It is possible that this consultation process seemed cumbersome and confusing to local officials; however, the State believes it made every effort to be transparent, informative, responsive, and inclusive of all stakeholders throughout the realignment effort.

4	9/12/19	Diana Gradert	<p>First off, I didn't receive any notice of invitation to attend any meetings regarding the changes to the plan. We did have a visit from someone with the State, but we had no participation in any conversations regarding changes and we had no options for comments except the one appeal which was completely ignored. My question is whether the entire State Workforce Board was given ample opportunity and time to review the appeals which were sent in. The word is that they were given two hours to read 8 appeals and that one was 80 pages long, so when they voted, it was basically a railroad job without full and open discussion. I would have made as many trips as need to Des Moines as possible in order to have input into this process. Our Board is very unhappy about the way this has been handled and the decision that was made to enlarge our area the way it has been presented. Diana Gradert Chair of Region 9</p>	<p>IWD emailed complete copies of all realignment appeals to all members of the State Workforce Development Board on May 28, 2019. In that email, all members of the State Workforce Development Board were asked to review the appeals prior to the Board meeting on May 30, 2019.</p>
5	9/13/19	Charles Ambrose	<p>I would like to respond to the second paragraph under section "B" on the fourth page. That paragraph states that between December 2017 and February 2018 the State of Iowa engaged in extensive consultation with CEOs, community colleges, Title providers, WIOA core partners, Legislators, local and SWDB members, and IWD staff. It goes on to say that there were 13 local board meetings where IWD attended. There were IWD staff at some meetings in Region 14, but there was never discussion about the specifics of realignment or the financial aspect related the the realignment issue. Region 14 was never given the opportunity to participate in the development of the current realignment plan that the state board approved Had our region been given the chance to participate in the realignment plan development process we would have arranged meetings with the surrounding regions to discuss how we could collectively manage available funds ( had the state provided us with the financial numbers to do so ) to our region and surrounding regions. We were never provided with the actual financial numbers for our region. Region 14 serves a large rural area with developing commercial and service needs that are specific to Region 14 and we feel our input in any realignment plan, should have at least been considered. Charles Ambrose, CEO Board Chair, Region 14</p>	<p>The State believes it has satisfied the requirement of "consultation" set forth in 20 CFR 675.300. It is possible that this consultation process seemed cumbersome and confusing to local officials; however, the State believes it made every effort to be transparent, informative, responsive and inclusive of all stakeholders throughout the realignment effort.</p>