



SUMMARY OF COMMENTS

There were 9 comments to the draft version of this policy:

Comment #1 - Section V(A), Reporting Leveraged Resources: Is it possible to incorporate the notation of funding source within a single report versus submitting two reports for Adult and Dislocated Worker?

Resolution – The Workforce Alliance of the North Bay Leveraged Resources Report is designed to be completed for each funding source.

Comment #2 – Section V(A), Reporting Leveraged Resources: If the service provider has no leveraged funds to report, must they submit a report indicating zero leverage for each source?

Resolution – Yes.

Comment #3 – Section VIII (C) (1 and 2) Training Expenditure Requirement Oversight: Is there an agency need or community benefit to implementing an expenditure requirement over the period of a year versus the allowable two-year period the funds are available?

Resolution – Yes. Total training expenditure requirements are also built into the service providers contract for the program year.

Comment #4 – Section VIII (C) (1 and 2) Training Expenditure Requirement Oversight: Will the board be informed that the WIOA regulations and State directives allow for allocations to be expended over a two-year period to meet this requirement and this is an additional hurdle for meeting the 30% expenditure requirement that is not applied by other Locals?

Resolution – Yes.

Comment #5 – Section VIII (C) (1 and 2) Training Expenditure Requirement Oversight: Is the service provider to use the first and second target amounts as guidance or “requirement”?

Resolution – The target amounts are to gauge attainment of the training requirement and designed to give structure and support to clearly identify progress in achievement of the training requirement.

Comment #6 – Section VIII (C) (1 and 2) Training Expenditure Requirement Oversight: The requirement of expenditure is flexible and can be adjusted to meet the needs of the customer who on the average is spending funds over a two-year period for education. Will the policy address any flexibility?

Resolution – The training expenditure requirement is 30 percent of the Adult and Dislocated Worker formula fund allocation and is designated annually in each service provider contract. This is not flexible. Service providers are welcome to make presentations to the board explaining strategies they are using to ensure successful attainment of the training expenditure requirement.

Comment #7 – Section VIII(D) Training Expenditure Requirement Oversight: What are the formal steps/time frames used by the Alliance to impose each of the consequences?

Resolution – This would be dependent on the board based on the circumstances for not meeting the training expenditure requirement.

Comment #8 – Section VIII(E) Training Expenditure Requirement Oversight: How will the Alliance apply this requirement to current service providers? Will service providers be retroactively held accountable?

Resolution – This policy would be effective immediately and apply to PY2018-2019.

Comment #9 – The new requirement for quarterly reporting of leveraged resources is a concern. The DOL and EDD does not require this level of reporting for leverage funds. EDD Draft Directive (WSDD-184, not finalized as of this date) only ask that recordkeeping for leverage resources include the keeping and maintaining of sufficient records which can be independently verified by EDD. The Local Board has the discretion to add requirements, such as additional reporting, but with each added step there is a potential for unintended consequences.

Resolution – Attainment of the training expenditure requirement is an element the board has requested quarterly reporting. This is to include the reported leverage resource totals that can account for a portion of the training requirement. In addition, reporting these funds is included in service provider contracts. Intended consequences include clear and consistent communication to the board.

