



THOMAS P. MILLER & ASSOCIATES

# Responses to Public Comments on Colorado's WIOA Combined Plan

*Driving Colorado Forward Together: Colorado's Combined Plan for Execution of Workforce Development Activities* was released for public comment on January 11, 2016. Comments were accepted online and by mail through February 9, 2016. Additionally, performance targets were subsequently released for public comment in February 2016 and comments were accepted until March 11<sup>th</sup>. This document contains both the exact language of comments submitted and a response to each comment prepared by the agencies responsible for submitting the state plan.

We are very grateful for the engagement of the public in this plan and appreciate all comments that were submitted. You will see in the responses below that we take all public comments seriously and appreciate the many individuals and organizations that invested their time in helping improve the plan through concerns and constructive criticism. A key tenet of WIOA is partnership, and we believe that it is only through authentic partnership with all stakeholders involved that we can strengthen resources and develop sustainable programming that will drive Colorado forward.

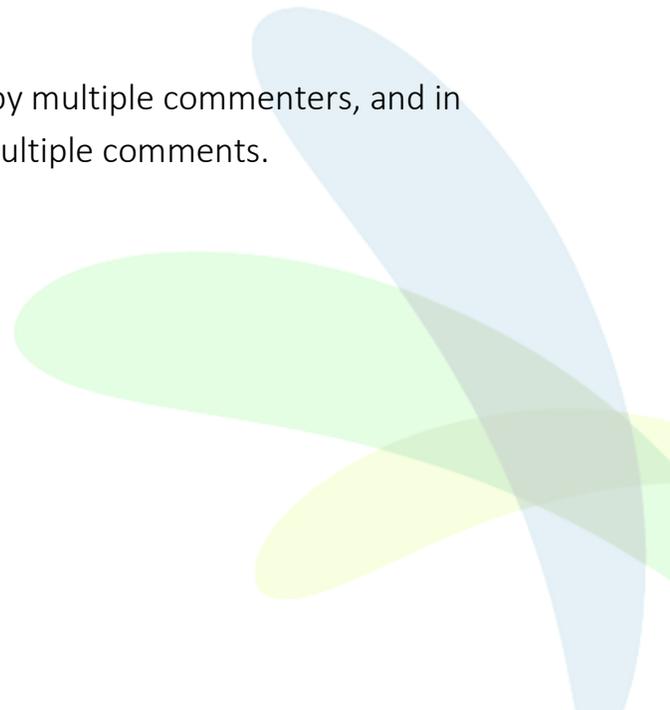
Please note that some comments were replicated by multiple commenters, and in these cases there is one response that applies to multiple comments.

Submitted Online:

**Comment 1**

**Date/Time:** 1/12/2016 – 10:52:38 AM

**Who:** Gail Srebnik



**Area:** Delta

**Plan Section:** III. (b)(5)(B)

**Comment**

In print the section on Adult Education and Family Literacy reads well. I think it is important to have the section about working with learners to help them work better with educating their children. My biggest concern is the reference to: "...Effort will be made to solicit proposals from each of the ten federally designated ....areas...". The area Delta County is part of is huge! Funding one of our 'neighboring counties' will not make classes available to adults living here in Delta County. Yet, it would seem that this may very well happen. I am concerned that these changes will leave some counties without funding for any Literacy Programs.

**Response:** Thank you for your comment. The requirements for Title II include implementing the competitive grant process described in the plan. WIOA brings the new requirement that there must be at least one funded Title II provider in each local workforce area. Due to the overall levels of available funding, it has been determined that following the federal guidance creates the best flexibility for programs and that it would not be feasible to attempt to guarantee that a provider is funded in every county in the state. Historically, Title II dollars have funded over 30 programs in most regions of the state.

**Comment 2**

**Date/Time:** 1/28/2016 – 1:59:06 PM

**Who:** Tammie Mack

**Area:** Las Animas

**Plan Section:** General Comment

**Notes:** No specific section, but mentions "Career Pathway" and advocates for maintaining a "Career Navigator" position within adult education.

**Comment:**

The state plan certainly explains what adult education does. In our program we currently have a "Career Navigator" that works with our adult education students on a bi-weekly basis, works out of the local workforce center weekly, and works out of the community college (where we are housed) advising students. She is currently paid through a grant and it is with great concern that when the grant ends we will lose this amazing service that all three of us have come to see works. The position of a career navigator is a must and something that I have attested to seeing a constant in connecting points between entities for clients.

Second, I'd like to see it defined more clearly the role each title program plays in spelling out a "Career Pathway." I know there are clear models for that, but who exactly needs to be responsible for what piece.

There are some great things happening right now in education. I'm excited to be a part of these and help our students make the transition after they complete a high school equivalent credential into the workforce, college, or CTE program.

**Response: Thank you for your comment. It is recognized that navigators have been used successfully in Colorado in a variety of ways to support individuals enrolled in one-stop partner programs. The State is open to exploring expansion and support of this type of model in connection to strategy 2.2.**

### **Career Pathways**

Lee

### Comment 3

**Date/Time:** 1/29/2016 – 11:48:54 AM

**Who:** Laura Ware

**Area:** Denver

**Plan Section:** General Comments

**Notes:** No specific section, but mentions "Career Pathway" for homeless persons.

#### **Comment:**

It would be good to work with employers to cultivate career pathways once a homeless person is employed - look at career pathway planning from both the employer and worker perspective.

**Response: Thank you for your comment. Colorado strongly values career pathways and views their development and implementation as a core component of our strategy for workforce development. A process for developing a statewide Career Pathways Framework is under development. Due to the timing of that effort, it was not referenced in the first version of the state plan released in January 2016. An overview of Colorado's Career Pathways Framework has been added to section II of the Combined State Plan.**

### Comment 4

**Date/Time:** 2/1/2016 – 10:57:49 AM

**Who:** Sue Chapman

**Area:** Denver

**Plan Section:** VII. SCSEP (C)(2)

#### **Comment:**

Is there anyway we could be added to the chart on pages 249-252?

I am with the National Indian Council on Aging(NICOA) and we are the other national grantee. It is a set aside grant, but it would be great to be mentioned as a national grantee.

Thank you!

**Response: Thank you for your comment. This section has been updated based on your comments.**

## Comment 5

**Date/Time:** 2/3/2016 – 11:01:40 AM

**Who:** Michelle Webster on behalf of Skills 2 Compete Coalition

**Area:** Denver

**Notes:** Eligible Training Provider List

**Plan Section:** VI. (b)(3)

### **Comment:**

#### COMMENTS ON THE ELIGIBLE TRAINING PROVIDER LIST

We applaud the state’s efforts to identify meaningful data that will be important for both local workforce development boards and consumers alike to make informed decisions about selecting training programs that are likely to lead to gainful employment. We want to ensure that the information that will be collected and made available through the new online system will be broadly accessible to consumers—that is, prospective students and their families. It is critically important that prospective students and families have access to the information that the WIOA draft plan has identified will be collected—data about costs, completion rates, job placement and starting salaries so students across the state can better make informed decisions about spending their education dollars wisely. This information should be made available in a consumer friendly manner, ideally in one place. College in Colorado is a good start and we would support using that website as the portal for prospective students to access the data programs will have to provide in their initial application and applications for on-going eligibility.

#### INITIAL APPLICATION

1. Supplies: In both the initial and continuation applications, programs should also report the cost of supplies for each training program. Some programs require students to invest in certain books or tools and those costs should be disclosed to prospective students.

**Response: Thank you for your comment. The State will require that training providers applying for eligibility on the ETPL to provide cost information, including supplies. This requirement will be addressed in policy.**

2. Debt Load: The state plan does not require programs to report any information on the debt load of students upon completion of the program. We would like the state to require programs to report data on student loan debt loads that is consistent with what the U.S. Department of Education requires of

institutions receiving Title IV student aid funds under its gainful employment rules. These programs are required to report median student loan debt for federal student loans, private education loans, and institutional financing plans. Cost of tuition, fees and supplies combined with median debt loan and data on earnings are important considerations for prospective students and should be included in the initial application and continuation application.

**Response: Thank you for your comment. The debt load is not required information under WIOA and it will not be a requirement for eligible training providers as it could be unduly burdensome.**

3. Licensing Exam & Registration: The state plan does not require programs to report whether the occupation for which the training is being provided requires the student to take a licensing/certification exam or register with the state. We would like programs to report for each training program whether students have to take a licensing/certification exam before they can be employed in the field of study, the passage rate for their students, the cost of the licensing exam and/or whether the occupation requires students to register with the state before they can be employed in the field/industry and the cost of registration. Finally, we would like the programs to report whether current state law bars people from employment in the field of study due to a past criminal conviction.

**Response: Thank you for your comment. The State is looking at the feasibility of adding licensing and registration requirements to the ETPL for each program. A web link from the ETPL to the list of careers which have restrictions due to a past criminal conviction will be added. This site is maintained by the Office of the State Defender:**

[pdweb.coloradodefenders.us/index.php?option=com\\_content&view=section&layout=blog&id=49&Itemid=146](http://pdweb.coloradodefenders.us/index.php?option=com_content&view=section&layout=blog&id=49&Itemid=146).

#### CONTINUED ELIGIBILITY

1. We would like to see information required by programs in the initial application also be updated in the application for continuing eligibility. Specifically:

a) Information on tuition, fees are only required in the initial application. These costs are likely to be adjusted somewhat from year to year. We think that information on tuition and fees should also be added to the list of data to be reported in the application for ongoing eligibility.

**Response: Thank you for your comment. All information for initial eligibility will be required to be updated at the time of continued eligibility, including tuition and fees. This is addressed in policy.**

b) Per the suggestion above, information on the cost of books, supplies and equipment should be reported both in the initial application and updated in subsequent applications for continuing eligibility.

**Response: Thank you for your comment. All information for initial eligibility will be required to be updated at the time of continued eligibility. This is addressed in policy.**

c) Information on student loan debt loads as described above should also be reported in the continuation application.

**Response: Thank you for your comment. All information for initial eligibility will be required to be updated at the time of continued eligibility. This is addressed in policy.**

d) Starting in 2017, post-secondary programs receiving Title IV funds will be required to disclose the most recent program cohort default rate and whether the program is at risk of losing Title IV eligibility in the next year for failure to meet debt-to-earnings benchmarks (see §668.403(c)). We would like programs on the ETPL that also receive Title IV student aid to report the program cohort default rate and whether the program has failed to meet the debt-to-earnings benchmark set by the U.S. Department of Education.

**Response: Thank you for your comment. It has been determined that it is not equitable for the ETPL user to display information that is only available for a small set of programs, but a link from the ETPL to publicly-available information on student debt and default rates will be provided.**

e) Provide updates on requirements for licensing/certifications exams or registration requirements, passage rates on licensing/certification exams, and costs associated with licensing/certification exams and/or registration.

**Response: Thank you for your comment. The State is looking at the feasibility of adding licensing and registration requirements to the ETPL for each program.**

2. Both new applicants and continuing programs—should be required to submit all the information outlined for new applicants. That list contains some important basic information on the programs that will be useful to both local workforce boards and prospective students.

**Response: Thank you for your comment. All information for initial eligibility will be required to be updated at the time of continued eligibility. This is addressed in policy.**

3. Programs should be required to update this information every year rather than every two years.

**Response: Thank you for your comment. WIOA requires continued eligibility to be determined every two years. The State has determined it would be unduly burdensome to the providers to re-apply for eligibility every year.**

## Comment 6

**Date/Time:** 2/5/2016 – 2:28:09 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** II. (1)(B)

**Notes:** Number of planning regions

**Comment:**

Pg 17 – (bottom third of page) - Under the discussion of unemployment rates in planning regions, only the 5 original planning regions are reflected rather than the seven planning regions the State has designated as described on page 105.

**Response: Thank you for your comment. The data on employment rates has been updated to match the planning regions described on page 105.**

### Comment 7

**Date/Time:** 2/5/2016 – 2:28:36 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** II. (2)(A)

**Notes:** Typo

**Comment:**

Pg 25 – (under Collaboration of Activities heading, 1st paragraph 6th line) – Should read “who hold a monthly directors meeting ...”

**Response: Thank you for your comment. This correction has been made.**

### Comment 8

**Date/Time:** 2/5/2016 – 2:29:06 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** II. (2)(A)

**Notes:** access to "Universal Class"

**Comment:**

Pg 27 – (1st paragraph 8th & 9th line) – Indicates that “Jobseekers can take advantage of free training through Connecting Colorado by accessing Universal Class which offers courses that cover health and life, technical, and soft skills.” Universal Class is not available statewide so the statement should either be eliminated or qualified as to what portion of the state it applies to.

**Response: Thank you for your comment. Universal Class is a product offered to job seekers by the Colorado Rural Workforce Consortium. As this section of the plan is referring to full statewide activities and resources, this statement has been eliminated.**

### Comment 9

**Date/Time:** 2/5/2016 – 2:29:47 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** II. (2)(A)

**Notes:** Career Readiness Certification - clarification on using CRC or WRC statewide

**Comment:**

Pg 28 – (1st paragraph 2nd & 3rd lines) – References the Career Ready Certificate (CRC) which was based on WorkKeys Assessments. The state has piloted the Conover Workplace Readiness Credential (WRC) and utilization of the Workplace Readiness Assessment in 6 workforce regions. It is unclear whether the state intends to utilize the WRC and the corresponding assessments statewide rather than using the CRC and WorkKeys. If this is the intent, the Combined Plan should reflect what will be utilized.

**RESPONSE:** Thank you for your comment. The plan will be modified to include a reference to the types of assessments covered by the current CRC, as follows:

By utilizing these services and successfully completing the appropriate assessments Coloradans are eligible to receive the Career Ready Certificate (CRC). The CRC is an assessment-based credential signed by the Governor that certifies a job seeker's skills. The certificate creates objective standards for employment readiness and demonstrates a job seeker's mastery of the work-applied skills employers are seeking. To earn a certificate, one must achieve appropriate levels for one or more of the vocational or soft skill assessment tests incorporated in the CRC by the State.

Additionally, if the current pilot of the WRC is deemed viable and made available statewide, then the WRC will be added to the 2018 plan modification.

### Comment 10

**Date/Time:** 2/5/2016 – 2:30:18 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** III. (a)(2)(C)

**Comment:**

Pg 53 – (second bullet under Low Income Individuals heading) - There are a number of counties that have the Colorado Works and WIOA programs embedded into the county human services department. It would seem to be beneficial for the Combined Plan to indicate that number so as to provide a broader sense of Colorado's integration of partner programs.

**Response:** Thank you for your comment. This section has been updated.

### Comment 11

**Date/Time:** 2/5/2016 – 2:30:18 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** VI. WP (e)(2)(B)

**Comment:**

Pg 143 – (paragraph number 3 & 4) – Line structure issues (sentence breaks to new line) in both paragraphs.

**RESPONSE:** Thank you for your comment. The plan will be modified to correct the line structure issues noted.

Comment 12

**Date/Time:** 2/5/2016 – 2:30:57 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** VII. SCSEP (C)(2)

**Comment:**

Pg 237 – (bottom paragraph) – It is unclear whether this is currently common practice for SCSEP programs in all Workforce regions.

**RESPONSE:** Thank you for your comment. The practices described are made available in all SCSEP programs in the state.

Comment 13

**Date/Time:** 2/5/2016 – 2:31:21 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** VII. SCSEP (F)

**Comment:**

Pg 242 – (under Local Workforce Centers heading, item 1, a) – Similar to comment for Pg 28, this references Work Keys and Key Train. If the state intends to move away from the CRC and WorkKeys and instead utilize the Conover Workplace Readiness Assessments and Credential this reference should reflect that intention.

**RESPONSE:** Thank you for your comment. The plan will be modified to clarify that these are examples of assessments and not the only assessments offered.

Comment 14

**Date/Time:** 2/5/2016 – 2:32:05 PM

**Who:** Linda Perez

**Area:** Weld

**Plan Section:** VII. JVSG (f)

**Notes:** Priority of Service for Veterans

**Comment:**

Pg 293 – (paragraph under Priority of Service in Employment Opportunities heading) – Line 3 incorrectly states job orders entered into Connecting Colorado “are placed in a 24 hour “vet hold” status”.

Guidance for Priority of Service for Veterans and Eligible Spouses noted in Colorado Department of Labor and Employment Policy Guidance Letter (PGL 14-07-V) states this is a 4 hour hold.

**RESPONSE:** Thank you for your comment. The plan will be modified to reflect the 4 hour veterans hold as stated in PGL 14-07-V.

### Comment 15

**Date/Time:** 2/5/2016 – 3:36:46 PM

**Who:** S. Casey O'Donnell

**Area:** Denver

**Plan Section:** III. (a)(2)(C) and VII Colorado Works

**Comment:**

These comments are submitted on behalf of the All Families Deserve a Chance (AFDC) Coalition. The AFDC Coalition promotes public policy to improve the lives of all Coloradans living in poverty. Our comments are limited to how low income single parents are served in the proposed plan. This includes both families receiving Temporary Assistance to Needy Families, as well as the majority of low income single parents in Colorado who are not receiving TANF.

Single parents are far more likely than most other groups to live below the federal poverty level. 12% of Colorado's population lives in poverty, compared to 42% of female single parents. 58% of mothers without a high school diploma live in poverty, compared to 10% of mothers with a Bachelor's degree or higher. A job with a future or training for an in- demand job can not only address a mother's need for income and education, it can positively affect the child's development and future success.

WIOA requires a new prioritization of services for those facing barriers to employment. Under

WIA, if a workforce center felt they could serve all, they did not need to prioritize services for these groups. Specifically population names in WIOA include:

- -low income individuals
- -single parents, including single pregnant women
- -individuals within two years of exhausting lifetime eligibility for TANF

While the plan mentions the new prioritization of services to populations with barriers to employment (page 53), it does not spell out how this prioritization is demonstrated.

**Response: Thank you for your comments. The plan will be modified to include the following question and answer:**

**(4) *Adult Priority of Service:* Describe how the State will implement and monitor the priority for public assistance recipients, other low income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.**

**Colorado has issued Policy Guidance Letter WIOA-2015-07: Priority of Service for Title I Adult Programs that provides detailed guidance to local areas regarding implementation of Adult priority of services. This guidance includes definitions of the priority groups, identifies how veterans priority of service interfaces with adult priority of service, sets a minimum goal of 51% of adult enrollments meeting priority definitions, and requires local boards to create local policies that must include:**

- **Local procedures for determining priority during the eligibility process and enrollment;**
- **How the local area will define “low income” (it may be more stringent than the state definition in this PGL) and the relevant data used to establish the definition;**
- **What criteria and procedures will be used to assess priority for basic skills deficient individuals;**
- **Any local requirements, such as residency, that will be established in relation to the four priority groups;**
- **Any local discretionary priorities that will be established in addition to the four targeted groups, the data to support the need for the local priority, and the documentation that will be required from an individual for the local priority; and**
- **Local procedures for internal monitoring of the goal to serve 51% of Adult participants from the priority targeted groups.**

**The Colorado Department of Labor and Employment will add the Adult Priority of Service requirements to its annual compliance monitoring review of each local area within the state. PY15 will be a base building year with technical assistance provided by the state, and PY16 will serve as the first compliance year for meeting the 51% goal.**

(Continuation of Comment) The section on Colorado Works does spell out in specific how Colorado Works complies with federal requirements (pp 223-229), but we were hoping to see what new actions will be taken. The short narrative on page 53 mentions some examples of differences in the formal and organizational relationship between human services and workforce centers, and options for co-location. We believe there are pluses and minuses to having people served primarily under human services and/or their vendors, or primarily under workforce and their vendors. Workforce centers may be more attuned to the employer community and in-demand jobs, but many clients need more wrap around services and more intense case management/support than what the workforce system offers.

We were hoping for a more concrete plan for linking services both within WIOA partner agencies, as well and with non-WIOA funded community or governmental services. When a client is working with multiple agencies a best practice would be to assign one lead case manager who would coordinate with all agencies involved in the client’s life to assist in formulating one plan for the client. We’d like to see

this kind of detail in this plan. The Colorado Works Section (pp 223-229) reads as a description of current services or a statement of compliance with law.

The plan states that a majority of those served must come from underserved groups. How will Colorado insure that TANF recipients get the full range of training opportunities that exist under WIOA? Will TANF recipients, single parents and others who face a barrier to employment be allotted a majority of dollars in training accounts? What are the new and different partnerships between adult education and Colorado Works, given that many TANF recipients lack a high school diploma? How will Colorado Works better utilize Vocational Rehabilitation to assess and retrain TANF clients who may have disabilities? What job opportunities targeted for youth might be available for parents 16-24 yrs old on TANF? How will they be identified and referred? How will Human Services and WIOA funded staff be trained on resources that could be available to clients outside of their own system?

**Response: Thank you for your comment. The questions you present regarding Colorado Works are seeking a level of detail that we believe is too specific for the four-year state plan. These types of questions are best addressed through local area plans and regional plans that are currently being developed.**

(Continuation of Comment) We noted the lack of a Career pathways model included in the draft. We know the state has been working on one. Perhaps it was not included because no other illustrations were in the plan as currently formatted. We would like to see the WIOA State Implementation plan include a model of Career Pathways, with explicit “on-ramps” marked for TANF recipients.

**Response: Thank you for your comment. Colorado strongly values career pathways and views their development and implementation as a core component of our strategy for workforce development. A process for developing a statewide Career Pathways Framework is under development. Due to the timing of that effort, it was not referenced in the first version of the state plan released in January 2016. An overview of Colorado’s Career Pathways Framework has been added to section II of the Combined State Plan.**

(Continuation of Comment) We were also disappointed at the plan’s silence on addressing childcare needs. There are only four sentences that mention childcare in the entire 330 document. Having safe, affordable and reliable childcare is essential to effectively serving low-income single parents. Otherwise they lose access to training and work opportunities. We’d like to see some detail such as provision of childcare navigators who would assure the more difficult to serve clients are assured access to childcare.

**Response: Thank you for your comment. Colorado understands the need for childcare support for low-income single parents to effectively pursue training and work opportunities. It is one of many barriers that individuals face and an issue that will be addressed through the implementation of Strategy 2.2 and Strategy 3.1.**

(Continuation of Comment) Performance measures should be negotiated which serve low income single parents, TANF recipients and others facing barrier to employment. If measures are set too high, the system is incentivized to “cream”, serving those with fewer barriers and more skills and solid job history. Measuring skills gain and credentials attained can show progress made when people are starting from farther behind.

**Response: Thank you for your comment. Proposed performance measures have been published separately for public comment. While we see the potential value in having different performance targets for specific groups of individuals, the federal law and proposed rules do not allow for that type of breakdown.**

## Comment 16

**Date/Time:** 2/5/2016 – 3:41:00 PM

**Who:** Chaer Robert

**Area:** Denver

**Plan Section:** General Comments - references VI. VR (o), Attachment 1, and VI. (b)(3)

### **Comment:**

Skills2Compete Colorado is a multi-sector advocacy coalition focused on workforce development and middle skills jobs. Previously, we lobbied for the Colorado Skills for Jobs Act (2012), the Integrated Basic Education and Skills Training (IBEST) bill (2013), the Adult Education Workforce Partnerships (2014), and the approval of two other high school equivalency vendors in addition the GED (State Board of Education (2015). We lobbied federally for WIOA passage as part of the National Skills Coalition. This list also reflects our values and priorities.

While data from the Skills for Jobs Act Report contributed greatly to the draft plan, we would have loved to have seen more about the Adult Education Workforce Partnerships and IBEST in the report. Both are great examples of what we think the new WIOA envisions: working across systems to better help people acquire skills for in-demand jobs.

Our most over-riding comment is that the plan seemed to be more about what Colorado programs are currently doing rather than what they will be doing differently. Some members commented that both the Adult Ed and the Colorado Works sections seemed to be a cut-and-pasted from older plans. We would want to see more in the plan about the new bridges between programs that WIOA envisions, as well as how WIOA entities will partner with other government programs (SNAP E&T, CCCAP, HUD Continuum of Care, etc) and community based organizations. Given flat funding for WIOA, coordination across agencies is the best opportunity to serve people better. The Governor's set aside priorities includes funding for staff training. Cross training of staff can help those working in workforce centers, adult education programs, vocational rehabilitation, Colorado Works, and youth services understand the other services and programs a person might need and the role they play in a larger vision of skills acquisition, career pathways, support services, etc.

**RESPONSE: Thank you for your comment. The content in the plan is influenced by the questions that must be responded to, and a majority of the questions ask about the current state. The two-year plan modification will provide an opportunity to assess what has worked under WIOA and to shift the language in the plan to be more future oriented.**

We also expected to see more about the new priority for serving those with barriers to employment. We know that nationally about 40 percent of clients would fall into one of the populations listed in WIOA as requiring priority of service. In the Colorado draft plan, the target appears to be 50 percent (“a majority”). As our unemployment rate falls, it would seem that more of the unemployed job seekers might have significant challenges. We would like to know how the new priorities will be expressed in business practices, adjustments to outcome measures, recruitment efforts, changing need for support services, and staff time for work with clients and businesses. Voc. Rehab at least opens the door by acknowledging (page 202) that they have underserved certain populations. In the Voc. Rehab and Senior Community Service Employment Program section, they do list some planned outreach measures.

**RESPONSE: Thank you for your comment. The plan has been updated to include more information on the adult priority of service. However, details on how this change will impact business practices is best addressed in local area plans rather than the state plan.**

In the data section (page 307), we would like to see more description and figures. Shouldn't it include data and narrative on who are the English language learners in Colorado, or who lacks a high school diploma? Page 307 does list a number for TANF —91,439— but does not explain what the number represents. The figure is certainly high than the current state caseload of households receiving a monthly grant. We would also like to see a figure indicating how long Colorado families tend to remain on TANF. This has implications for the length of training opportunities that best serve TANF recipients, as well as income, and potential shifts in access to child care and other support services. The sections on veterans and on seniors both contained a portrait of the variety seen within their populations and a brief analysis of the challenges facing those groups. They also gave specific efforts to customize services to each group. We would like to see more of this elsewhere in the document.

Skills2Compete also submitted comments separately specifically on the Eligible Provider Training List. We have been working on the need for consumer information about career training options, and in particular on the more expensive private occupational schools. Since WIOA will require outcome, employment, and income data, it is an important opportunity to make this information publicly available to all Coloradans, and in a consumer friendly format.

We are very excited and supportive of the vision of WIOA— with emphasis on sector partnerships, career pathways, serving more job seekers with challenges to employment, and working across the silos that are so frustrating for job seekers. As a cross sector coalition, we gain much by hearing the perspective of those working in different programs and agencies, including adult education, community colleges, community based work preparation and job placement services, vocational rehabilitation, advocacy organizations, private employers, and workforce center representatives. We would love to see more of this reflected in the plan.

**RESPONSE: Thank you for your comment. A section on Colorado's statewide career pathways framework has been added.**

## Comment 17

**Date/Time:** 2/5/2016 – 5:58:28 PM

**Who:** Chaer Robert

**Area:** Denver

**Plan Section:** General Comments - references III. (a)(2)(C)

**Notes:** Homeless individuals

### **Comment:**

Many Coloradans become homeless after losing a job because it's nearly impossible to pay rent without sufficient income and savings. One in 4 Colorado renters -164,600 -pay more than 50% of their income for rent, putting them at risk for homelessness. Since 2007, average rent here has increased by 21% while income for the renter household has only increased by 1.1%. In today's economy, the reliability and consistency of work hours may vary – particularly for those with the lowest-wage jobs. In metro Denver, over 30% of those experiencing homelessness have worked in the last month. One's best hope for stable housing could be skills training to get a better paying job.

Under the new WIOA, workforce boards and job centers are supposed to prioritize services to those, with barriers to employment, including homelessness. The plan mentions this (p 53), indicating that a majority of Colorado's WIOA adult customers will come from these priority populations. HOW WILL THE STATE INSURE THIS HAPPENS? What will be changing because of WIOA's required priority of service? This should be spelled out explicitly.

A majority of those experiencing homelessness have children in the household. Physical disabilities or mental illness can make working impossible, but many with such disabilities would welcome the opportunity to work. Some of those who are homeless are leaving prison or jail. They are required to work, but finding employment and housing is more difficult because of their record. Domestic violence victims may also struggle to secure employment, income, and stable housing if they are forced to leave their homes.

Are workforce centers planning to implement the culture change and change in business practices necessarily to effectively serve people who have experienced homelessness and the resulting trauma, or are there plans to identify, partner with, or subcontract to specialized programs? Or are they planning to have specially trained staff within workforce centers who can spend additional time with each person?

What factors are weighed in deciding whether to co-locate services in a one-stop, contract with CBOs or station staff within a CBO? For many clients, a community based organization is far more approachable than a government workforce center.

How are outcome measures negotiated? Under WIA, outcome measures were placement rate and salary level, building in pressure to "cream." As one former workforce employee was frequently told, "homeless people ruin the numbers." Realistic outcome measures need to include documented skills gained, and need to factor in increased support for homeless clients.

What types of employment and training approaches are needed to effectively serve those who have experienced homelessness? Some may benefit from adult education to obtain a high school equivalency diploma, opening up more possibilities for jobs. Some need VocRehab to retrain after injury prevents them continuing their previous vocation. Some without recent work history may need supported employment or transitional jobs to learn the soft skills and discipline associated with job retention. Many need paid training or immediate employment to have the income to maintain stable housing. Many need support services like child care or transportation. Some need help to know how employment income will affect eligibility for SNAP, LIEAP, housing, social security, or disability benefits.

How will WIOA funded entities including workforce centers, Vocational Rehabilitation, Adult Education, youth programs, etc. work with programs and services who work with the same populations? SNAP E&T is mentioned, but no partnership or collaboration is described. How will they collaborate with HUD funded Continuum of Care programs (which have work requirements) to serve those who have experienced homelessness? Ideally, in a world of limited budgets- working across silos would allow providers to serve people more efficiency. Cross training could WIOA entities serve those with barriers to employment. Suggested topics would include trauma informed care and motivational interviewing.

Since membership on WIBs and CWDC is limited by law, we would suggest an advisory committee to develop and assess WIOA's progress in serving those with the WIOA named barriers to employment. Truly giving priority of service to the WIOA named populations is best done in conjunction with other programs that work with homeless individuals, the formerly incarcerated, out of work youth, single parents, people with disabilities, etc.

Colorado Center for Law and Policy will be working with employment programs that serve homeless Coloradans and compiling data and information on best practices. We look forward to working with the state workforce system and with regions and localities on employment and training services to people who have experienced homelessness.

**Response: Thank you for your comment. The policy for the Adult Priority of Service will be monitored by Workforce Development Programs within CDLE. Each local area has different needs and different populations and therefore the specific details referenced in regards to recruiting and serving customers are best addressed in local area plans and not the state plan. Outcome measures are established for customers as a whole and cannot be segmented by customer type per federal requirements. The model utilized to set performance measures does take into account a variety of factors and is designed to create balanced targets.**

### Comment 18

**Date/Time:** 2/7/2016 – 8:49:47 AM

**Who:** Matthew G. von Hobe

**Area:** Fremont

**Plan Section:** III. (b)(6)(D)

**Comment:**

Just NO on more data mining and sharing

### Comment 19

**Date/Time:** 2/7/2016 – 8:50:50 AM

**Who:** clifford andersen

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

No!

### Comment 20

**Date/Time:** 2/7/2016 – 9:03:40 AM

**Who:** Julia Mekelburg

**Area:** Yuma

**Plan Section:** III. (b)(6)(D)

**Comment:**

No. No. No. No data mining. No sharing of pii. No Common Core. No standardized testing.

### Comment 21

**Date/Time:** 2/7/2016 – 9:04:10 AM

**Who:** M Lipscomb

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

Please do not move forward with this plan for student data. It is not needed and as a parent I have significant concerns about data privacy and security. Thank you

### Comment 22

**Date/Time:** 2/7/2016 – 9:07:51 AM

**Who:** Kristi Butkovich

**Area:** Denver

**Plan Section:** III. (b)(6)(D)

**Comment:**

Not just No - Hell NO!

Comment 23

**Date/Time:** 2/7/2016 – 9:25:33 AM

**Who:** Florence

**Area:** El Paso

**Plan Section:** III. (b)(6)(D)

**Comment:**

We have seen what happens when names get put into databases. We are told they are secure and safe. Then, somewhere down the road, we learn of data breaches. I am totally against linking systems because of the potential for abuse, the potential for lack of security and the potential for use by under-handed individuals in the future.

Comment 24

**Date/Time:** 2/7/2016 – 9:26:23 AM

**Who:** David Peters

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

No

Comment 25

**Date/Time:** 2/7/2016 – 9:26:31 AM

**Who:** David Peters

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

No

Comment 26

**Date/Time:** 2/7/2016 – 9:44:40 AM

**Who:** John Marquez



**Area:** Adams

**Plan Section:** III. (b)(6)(D)

**Comment:**

No

### Comment 27

**Date/Time:** 2/7/2016 – 9:44:43 AM

**Who:** Mike Gaylord

**Area:** El Paso

**Plan Section:** III. (b)(6)(D)

**Comment:**

No! This is wrong!

### Comment 28

**Date/Time:** 2/7/2016 – 10:26:31 AM

**Who:** Barbara Penezic

**Area:** Fremont

**Plan Section:** III. (b)(6)(D)

**Comment:**

NO!

### Comment 29

**Date/Time:** 2/7/2016 – 10:34:28 AM

**Who:** Walker

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

Unconstitutional. Infringes on right to privacy.

### Comment 30

**Date/Time:** 2/7/2016 – 12:34:05 PM

**Who:** Lisa Vavrik



**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

I have not seen that you really care what the public thinks, but understand that this forms shows we were asked. NO

### Comment 31

**Date/Time:** 2/7/2016 – 2:12:57 PM

**Who:** Karen

**Area:** Jeffco

**Plan Section:** III. (b)(6)(D)

**Comment:**

I do not agree with the initiative you ate presenting

### Comment 32

**Date/Time:** 2/7/2016 – 2:27:09 PM

**Who:** Cathy Gardino

**Area:** Cathy Gardino

**Plan Section:** III. (b)(6)(D)

**Comment:**

No... No... 1000 times, NO!

### Comment 33

**Date/Time:** 2/7/2016 – 2:42:24 PM

**Who:** Lorelle Tunnicliff

**Area:** Larimer

**Plan Section:** III. (b)(6)(D)

**Comment:**

No! Please do not collect, link, & share student data! Students and parents deserve privacy.

### Comment 34

**Date/Time:** 2/7/2016 – 2:52:07 PM

**Who:** L

**Area:** Larimer

**Plan Section:** III. (b)(6)(D)

**Comment:**

No! Keep student data private & safe.

### Comment 35

**Date/Time:** 2/7/2016 – 8:59:07 PM

**Who:** Carmen Cornils

**Area:** Arapahoe

**Plan Section:** III. (b)(6)(D)

**Comment:**

NO LINKING student data bases and SHARING student data.

### Comment 36

**Date/Time:** 2/7/2016 – 11:08:15 PM

**Who:** Kasey

**Area:** Arapahoe

**Plan Section:** III. (b)(6)(D)

**Comment:**

This is not in the best interest of children or the state of Colorado. Tracking students during their formative years is wrong. Please do not vote yes on this. The privacy of children is at stake.

### Comment 37

**Date/Time:** 2/8/2016 – 7:24:24 AM

**Who:** Heather Fritz

**Area:** Mesa

**Plan Section:** III. (b)(6)(D)

**Comment:**

Anonymous data tracking that, in general, tells how students are prepared for college or the work force after high school may be okay. I am completely opposed to detailed information about individual children being shared with any organizations. Families and children should have a right to privacy regardless of what FERPA allows. I do not want my children's private information to be used in this way.

**Response to Comments 18 – 37, 39, 41-42, 44:** Thank you for your comment. Colorado strongly values privacy and has indicated the safeguards in place in section III.(b)(6)(d) of this plan. Colorado’s Combined Plan for the Execution of Workforce Development Activities primarily serves adults or those outside of the Pre-K-12 educational system. It is incorrect to interpret the term “student” in this plan to be equivalent to “child” or “children”. Data on customers of programs is maintained for follow-up purposes, but it is not linked to a K-12 longitudinal data system in any way. The educational programs and databases referenced by the Colorado Department of Education are in regard to the Office of Adult Education Initiatives only. All data sharing that is conducted is done only with the consent of the customer and agreements that are in place are in compliance with FERPA. Federal law will be followed in all subsequent agreements.

### Comment 38

**Date/Time:** 2/8/2016 – 10:56:44 AM

**Who:** Gary Sanford, Metro Denver Homeless Initiative

**Area:** Representing Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson counties

**Plan Section:** General Comments

**Notes:** Serving Homeless population, priority of service for individuals with barriers, performance numbers adjusted for individuals with significant barriers, and staff training to assist in serving target populations

**Comment:**

Metro Denver Homeless Initiative (MDHI) Comments for WIOA State Plan:

As informed by the Employment Subcommittee, MDHI makes the following recommendations:

1. That people who have experienced homelessness be viewed as potential workforce members and priority populations for workforce centers.
  - a. That workforce centers serve each customer to the best of their ability without regard to how the individual and his or her challenges impact performance standards.
  - b. That workforce centers adopt different performance standards for people who are determined to have significant work barriers.
  - c. That workforce centers develop diverse progress milestones for people with significant employment barriers including people who have experienced homelessness (i.e. markers that measure more than initial job placement).
2. That workforce staff be expected to serve individuals with barriers with a flexible, customized employment plan rather than with a one-size-fits-all employment plan.

a. That workforce staff be trained on an array of barriers to employment, and be knowledgeable about resources for addressing specific barriers so that they can direct customers accordingly. In addition to a general proficiency of all staff in these areas, we believe it is important for centers to have specialized staff members with specific expertise in serving people who have experienced homelessness, people with offender histories, and people with other barriers to employment.

b. That all workforce staff be trained in varied approaches to working with customers. Examples would include having exposure to trauma informed care, motivational interviewing, harm reduction interventions, working with youth and adult offenders, and cultural competency that understands how lifestyle and societal factors impact every individual's career choices.

c. That workforce staff be well exposed to diverse community resources that complement career pathway planning for each individual's needs.

3. That the WIOA State Plan promotes stronger coordination between federal employment programs and initiatives (i.e. WIOA; the Department of Labor; the Department of Housing and Urban Development Priorities, including the HUD Continuum of Care Plans; SNAP employment/training).

**Response: Thank you for your comment. The priority of service requirements for the Adult program are referenced in this state plan and the language has been enhanced in response to comments. The specific details on how the priority will be implemented, including the partners or sub-contractors enlisted to support this work, will vary in each local area. Local plans should articulate the level of detail that is being requested in these comments. We are open to all of the topics that are mentioned as a part of our cross-training efforts and to partnering more closely with HUD programs to implement this plan.**

### Comment 39

**Date/Time:** 2/8/2016 – 12:33:21 PM

**Who:** Sheryl Cunningham

**Area:** Arapahoe

**Plan Section:** III. (b)(6)(D)

**Comment:**

I say NO to linking student data bases and using student data to track students.

### Comment 40

**Date/Time:** 2/8/2016 – 1:37:17 PM

**Who:** Scott Kerr

**Area:** Denver

**Plan Section:** General Comments concerning individuals with disabilities - Reference VI. VR

**Comment:**

Workforce Innovation and Opportunities Act – Colorado State Plan

Comments from Bayaud Enterprises (Bayaud), Inc.

- Bayaud has a mission that emphasizes the importance of employment for all people, including people with disabilities. The current plan is generally inclusive of people with disabilities, but historically the workforce system has been challenged to serve this population effectively, despite the desire and ability of people with “disabilities” to work and pursue effective careers. More specific language and intent should be added to the plan about how people with disabilities will access the workforce system, offered responsive and effective services that lead to positive careers, encouraged to access specific resources needed, and given relevant follow-along supports that lead to long-term employment and career pathways. The plan also needs more specific language and intent regarding how individuals with such “hidden disabilities” as learning and emotional issues, mental and behavioral health challenges, cognitive disorders and brain injuries will be served.
- Bayaud has been closely involved with the Division of Vocational Rehabilitation (DVR) for years. Bayaud has been a vendor for DVR, has served on the State Rehab Council, and senior staff have been national advocates for individuals with disabilities. Despite this history, Bayaud believes that the workforce system should play a more integrated role in partnership with DVR and other organizations that serve people with disabilities, so that the entire system incorporates practices and resources that support people with disabilities to be successful. This includes people with the “hidden disabilities” mentioned above. Many people who have disabling conditions that impact employment do not qualify for DVR, and it is important for the workforce system to support these individuals to pursue effective career pathways.
- Bayaud works with many individuals (including youth and people still living with their families) who have significant work barriers, have been unemployed for extensive periods of time, have offender backgrounds, and/or have experienced homelessness. We ask that measures of accountability be added that address how people who are extremely economically disadvantaged and need assistance will be specifically recruited, supported and trained to enter the workforce and pursue productive career pathways. Related to this, we believe there should be specific language and intent in the plan that discusses coordination with the Continuum of Care, which oversees programs for the homeless population. It is important to ensure that the workforce system and the Continuum of Care are compatible and share a goal related to ending homelessness – providing access to employment services for homeless people is an important part of this.
- Bayaud recommends adding language that speaks more directly about the need for services that enhance any individual’s ability to pursue long-term employability and employment. This includes access to benefits navigation resources that have historically been available to families who are part of the TANF system and people with disabilities who need benefits as well as employment and training services. It is important for this plan to discuss training for all workforce staff about benefits and how they complement long-term employability.

**Response: Thank you for your comment. All partners within the Colorado workforce system acknowledge the need to be inclusive of individuals with disabilities to ensure a diverse and effective workforce. While many of the specific details related to partnership with DVR and programming that is inclusive of individuals with disabilities at the local level will be**

addressed in regional plans, additional language has been added to explain how the workforce development system ensures compliance with physical and programmatic accessibility requirements. Cross training among program partners described throughout the state plan will support Workforce Centers and all partners to appropriately identify and support individuals with disabilities. In developing curriculum for cross training, the partners will explore the inclusion of information related to benefits and associated work incentives. The combined partners agree it is critical to have meaningful measures against which to evaluate performance, including access to services to those whom have the most critical need for services and the outcomes of services. Partners will initially focus efforts on mandated performance measures, which, along with anticipated data collection, do provide avenues for considering and evaluating effectiveness of services to those who face extreme economic disadvantages.

Further, the state plan currently addresses accessibility of the one-stop system in the following item:

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

Colorado has a rich history of going above and beyond the compliance requirements of Section 188 of the Workforce Investment Act (which are now incorporated in Section 188 of WIOA), and the American's with Disabilities Act of 1990. Over the life of the Workforce Investment Act, Colorado's one-stop system was governed by a comprehensive set of state policies regarding non-discrimination and accessibility that are in the process of being updated with the most current requirements. These policies include a robust system of monitoring to ensure that one-stop center programs practice non-discrimination and that centers accommodate the needs of those with disabilities. In addition, Colorado served as a lead state in the national Disability Navigator initiative between 2002 and 2009, providing technical assistance to other states and participating in the national evaluation process. During that time, the one-stop system partnered with Assistive Technology Partners, who worked with staff on the purchase of assistive technology and trained staff in its use.

Colorado expects to build upon its past successes by strengthening its partnership with the Division of Vocational Rehabilitation, which will become part of the Colorado Department of Labor and Employment as of July 1, 2016. As the leases for local DVR offices come up for renewal, there will be an effort to co-locate with one-stop centers. DVR staff is also preparing to provide ongoing training to their one-stop colleagues within the core programs and assist with the procurement and installation of more current assistive technology. Colorado's one-stop certification policy includes the following criteria related to accessibility:

*Physical and programmatic accessibility - ADA Guidelines:*

- *In compliance as shown by an inspection, audit, or review within last 3 years*

## Comment 41

**Date/Time:** 2/8/2016 – 8:45:46 PM

**Who:** Heather Taormina

**Area:** Jefferson

**Plan Section:** III. (b)(6)(D)

**Comment:**

No! Stop selling my children out!!

## Comment 42

**Date/Time:** 2/9/2016 – 3:18:33 AM

**Who:** Cheri Kiesecker

**Area:** Larimer

**Plan Section:** III. (b)(6)(A)(i) and III. (b)(6)(D)

**Notes:** Data privacy

**Comment:**

As described, workforce pathways is not only setting the stage for a National credential data badging system, it also aligns state and federal agencies for alignment and sharing of student data systems. Allowing more access to children's personally identifiable information is against the original spirit of FERPA, is in violation of Fair Information Practices (FIPs), parents cannot know what data is collected, how it is used or how it is shared, marketed, bartered or sold. Multiple data systems with access to a child's personal data also creates security concerns, increases breach risk. Data privacy, data transparency, data security issues need to be addressed in this plan. Parents and students should be in charge of their data, promoting a privacy as agency policy.

page 87:

III. Data Alignment and Integration. "To support these efforts, all partners are supportive of education and training on specific systems and are willing to advocate for policy changes as needed to establish data sharing agreements. A project has begun to share data between the Connecting Colorado system and the Colorado Benefits Management System (CBMS) used to track the Colorado Works and SNAP programs. This will allow workforce center staff to track services given to work ready participants in these programs in Connecting Colorado. Those services will then automatically move to the Human Services systems for Federal reporting."

Also concerning is this from Jobs for the Future: <http://tinyurl.com/hlgan3r> (JFF is funded by USDoE, USDoL and pages of large corporations, non-profits, including oddly enough, apparently Denver Public Schools is funding this mega power? <http://www.jff.org/about-us/funders>)

JFF repeats the mantra also mentioned in the Colorado Workforce Blueprint, insisting on the need to align data bases, gives examples of other states using pii from SLDS.

"Use data to strengthen connections to business, inform program development and measure success: State leaders expanded the use of the Longitudinal Database System, which tracks academic and employment history for students, to better support planning; the state also created a longitudinal data system to link and leverage data across the state's multiple education and workforce programs."

"The lessons from other countries strongly suggest that this might be the single most promising strategy for greatly increasing the percentage of young adults who earn a post-secondary degree or credential that prepares them to embark on a meaningful career."

"However, there is also a lack of understanding and communication between – not just the heretofore separate worlds of education and business – but also different areas of the education world (K-12, college and adult education – both public and private). Each has its own unique language and way of doing things, making it difficult for all stakeholders to arrive at a vocational or career and technical education system that can meet the needs of 21st century employers, education providers, and the students and workers seeking to acquire education and training credentials that are both "portable and stackable."

"Potential obstacles to developing a system of stackable, portable credentials in the U.S. include the following:

U.S. education at the secondary level is driven by individual states and local districts, making it more difficult to establish a nationwide system of credentialing" -Jobs for the Future

[Very troubling is that this is directly in line with US Dept of Labor, WDQi- Workforce Data Quality Initiative, to use pii, student-level data from state data systems, SLDS, starting in preschool. <http://tinyurl.com/jxsyyoc> ]

Finally, I am curious as to why this Colorado Ed Workforce Blueprint does not mention the \$10million pilot occurring in Denver Public Schools, as reported in this Denver Business Journal article, <http://tinyurl.com/hb29e3t> and also in this Press Release by the Markle Foundation, ReWork America <http://tinyurl.com/jz8xxjl> announcing the partnership of the state of Colorado, Markle, Kaiser, LinkedIn, edX and Intertech Plastics. The DPS data badging, workforce pilot is going to be scaled up is planned to be used state-wide: <http://tinyurl.com/hxdyzu6>

According to the Denver Biz article, the LinkedIn will develop software that will assist in the initiative--"a digital map that compiles data of LinkedIn users to connect talent opportunity on a massive scale —".

Distributing student data on a massive scale should only be permissible when and if a parent gives informed, verifiable consent. Knowing that data is gold, student data being shared on a massive scale either in badges or by linkage of data bases also lends to the temptation of using such data for financial gain. There should be enforceable penalties for misuse or breach or selling, profiting, or benefiting from

student data. Badge data should not be sold. Students and parents should control how/if badge data is shared.

**Response:** Thank you for your comment. The topic of data sharing is addressed in the response after comment 37 on page 21 of this document. Colorado is a partner with the Markle Foundation on the initiatives referenced above and has been working closely with them on the development of Skillful. Skillful is a new platform that serves the needs of middle-skilled job seekers and employers. It is not referenced in this state plan because it is not one of the federally-funded programs required to partner with workforce centers under WIOA. The data maintained by the partners of this plan is not being shared with LinkedIn. The Colorado Workforce Development Council and the state of Colorado have highlighted these partnerships and initiatives in other reports on our comprehensive talent development system, including the [Talent Pipeline Report](#).

### Comment 43

**Date/Time:** 2/9/2016 – 5:45:21 AM

**Who:** Isabel McDevitt

**Area:** Boulder County

**Plan Section:** General comments on homeless individuals

**Comment:**

Thank you for your hard work and for the thought put into the state plan.

I commend the emphasis on working with special populations including people experiencing homelessness. I have worked in programs that provide a "work first" experience for homeless adults for over 18 years and see a model that combines paid work in social enterprise coupled with housing and support services including sobriety support, financial management and life skills as fundamental for a large number of homeless adults to get the foundation they need for mainstream success. Our program, Bridge House's Ready to Work Program, runs two successful social enterprises that offer jobs, on-the-job training, industry certification and housing for a year as a stepping stone to a mainstream job. The investment is big up front in order to prevent the persistent cycles of homelessness, unemployment and criminal recidivism.

As it relates to the WIOA plan, I would recommend that local workforce centers have the flexibility and ability to contract with programs that already demonstrate unique and successful interventions for homeless people to gain and retain employment. From my experience homeless individuals often lack not only the resume but the confidence and basic stability to maintain any kind of employment for a prolonged period of time. Providers who can provide a holistic model are well-suited to not only impart job readiness skills but address all barriers to employment.

If you have a moment, please review this short video as an example of work in action.

<https://vimeo.com/142960028>

Thank you!

Isabel McDevitt isabel@boulderbridgehouse.org

**Response: Thank you for your comment. All local workforce development areas are authorized to contract with the service providers of their choice to meet the needs of the local community.**

### Comment 44

**Date/Time:** 2/9/2016 – 6:40:52 AM

**Who:** Lynn Roberts

**Area:** Denver

**Plan Section:** III. (b)(6)(D)

**Comment:**

No. Please don't share children's data. Children must be given the freedom to become their own future. They are not here to serve business interests. Watch for a mass exodus from public education.

### Comment 45

**Date/Time:** 2/9/2016 – 2:41:48 PM

**Who:** Experienced adult educator

**Area:** Denver

**Plan Section:** VI Adult Education and Literacy Programs

**Comment:**

- The Adult Education and Family Literacy section of the plan is brief, only 9 pages consisting mainly of required information from regulations. This brevity and lack of innovation and guidance related to adult education programs and services is of great concern to me as an adult education professional with almost two decades of experience in Colorado. The absence of specific guidance creates challenges for Colorado's 10 workforce regions in developing local plans. Historically in Colorado there has lacked true partnership and alignment between county workforce agencies (Title I) and adult education providers (Title II). With the brevity/lack of guidance in this section of the combined plan, I am concerned that this dearth of germane partnership will continue.

- Those with the greatest barriers to self-sufficiency are not included. This includes dislocated workers, single parents and adults with disabilities. The lack of explicit reference to providing services to those most in need tends to create "cherry picking" or "creaming", which means that grantees selectively serve those who can help them achieve required outcomes.

- o There is no mention of services essential to the consistent participation of those most in need such as childcare and transportation.

- Grantees will need a significantly higher level of funding to provide the number of hours of instruction needed to provide instruction based on the College and Career Readiness Standards (CCRS) and integrated education and training and the classroom space to do so

- oFY16 funding was cut 10% and it is unclear if these cuts will be restored in FY17

- oOCTAE requires adult education programs to use standards based instruction

- oMany adult learners do not have more than 5 hours per week to devote to classroom instruction; they have jobs and families and other responsibilities in their communities

- This plan references “distance education” but what is actually needed to extend opportunities for learning is hybrid instruction, blended learning and/or flipped classrooms.

- It is challenging to reconcile and/or balance the focus in all titles of WIOA on youth and adults in need of postsecondary education, job training, and employment with development of skills adults need to support their children and participate in civic society as referenced on pg. 152. There is no detail about how grantees can achieve required WIOA outcomes while serving parents who are not in the workforce and not in a position to join the workforce.

- These comments are related to the Integrated English Literacy and Civics grants referenced on pg. 153. These grants have historically focused on educating limited English proficient adults become educated about the rights and responsibilities of citizens and community members. Many of the participants in these programs do not have legal work authorization so it is unclear as to why 'preparing adults for employment' is referenced.

- State leadership in Title II has been vital in supporting the state’s efforts to assist grantees in offering high quality adult education services. The four state leadership priorities and projects on pg. 154-55 are vague and lack innovation. The information provided about projects #5 and 6 require the reader to extrapolate the potential for innovation. Project #8 seems somewhat like a catch-all but is actually one of the most important, if not the most important, project listed. The professional development (PD) self-assessment referenced in project #2 is out-of-date, and does not focus on the skills needed by teachers in the WIOA environment. It needs major revision to align with current PD priorities and best practices.

- Monitoring and evaluation is referenced first on pg. 155 and there is more text devoted to this than any other area in this section of the state plan. Again, with a 10% cut in funding in FY16 and no expectation for the restoration of this funding, this level of monitoring and evaluation presents an undue burden that is sure to take away from the development and delivery of high quality services.

- oTypes of monitoring and evaluation included: Desk audits; Onsite monitoring visits; Quarterly data review; Annual performance reports; Peer reviews; Self evaluation

#### **Response to Comment:**

**Thank you for your comment.** In regard to partnership, local plans will address the specific local needs for partnership. Local one-stop partners are encouraged to identify strategies and approaches that best reflect the unique needs of the local workforce development area.

Ensuring focus on individuals with barriers to economic self-sufficiency is essential. This comment has been accepted and a change has been made to the language in III.(b)(5)(B): for Title II (i).

Regarding the language about childcare and transportation, without final regulations, it is not clear if these are allowable so they are not included.

Regarding distance education to hybrid instruction, blended learning, or flipped classrooms, these topics are addressed in policy. AEI has developed a state policy for distance education that includes hybrid delivery as a component of distance education.

Regarding WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.

Regarding preparing adults who are English language learners for unsubsidized employment; section 243(c) of the Workforce Innovation and Opportunity Act requires the goal of programs receiving Integrated English Literacy and Civics Education funding to be designed for this purpose.

Regarding State Leadership projects, the current language will enable us to best meet the needs of WIOA and allow for flexibility and customization based on local needs. Therefore it has not been changed.

Regarding assessing quality, it has been determined that the level of assessment currently in the plan will increase communication with providers and will help programs meet goals established in requests for funding.

## Comment 46

**Date/Time:** 2/9/2016 – 3:08:19 PM

**Who:** Sylvia Van Nooten

**Area:** Montrose

**Plan Section:** VI Adult Education and Literacy Programs

**Comment:**

Montrose Adult Education Center has the following comments in reference to Title II Program Requirements:

- All the focus is on youth and adults in need of postsecondary education, job training, and employment. There is no detail about how grantees can achieve required WIOA outcomes while serving parents of children who are not interested in and/or are not in a position to join the workforce. Traditionally this group of adults has been considered “most in need”, but seems to be marginalized in the Colorado WIOA plan and in the Adult Education and Family Literacy section.

- These comments are related to the Integrated English Literacy and Civics grants referenced on pg. 153. These grants have historically focused on helping adults become more educated about their rights and responsibilities as community members in the US and more engaged in their communities.
  - o We don't agree that these grants should be tied to the outcome of unsubsidized employment. The results of becoming a better citizen naturally lead to economic self-sufficiency.
  - o It's unclear about how the preparation for employment will be integrated with the civics education.
  - o It's also unclear as to how those in need of English literacy skills who do not have work authorization will be served.
- The frequency of monitoring and evaluations of programs in the current plan will impact our ability to use our time to best serve our students.
- Smaller programs like ours lack the resources to spend large amounts of money on administrative duties such as monitoring and evaluation.
- A minimum of quarterly evaluations seems excessive.
- Grantees will need a significantly higher level of funding to provide the number of hours of instruction needed to provide instruction based on the College and Career Readiness Standards (CCRS) and integrated education and training and the classroom space to do so (most grantees are in borrowed space in constant jeopardy of being lost to other priorities in public school or library buildings).

## Comment 47

**Date/Time:** 2/9/2016 – 3:18:31 PM

**Who:** Anne Ventrello

**Area:** Montrose

**Plan Section:** VI Adult Education and Literacy Programs

### **Comment:**

Montrose Adult Education Center has the following comments in reference to

Title II Program Requirements:

· All the focus is on youth and adults in need of postsecondary education, job training, and employment. There is no detail about how grantees can achieve required WIOA outcomes while serving parents of children who are not interested in and/or are not in a position to join the workforce. Traditionally this group of adults has been considered "most in need", but seems to be marginalized in the Colorado WIOA plan and in the Adult Education and Family Literacy section.

· These comments are related to the Integrated English Literacy and Civics grants referenced on pg. 153. These grants have historically focused on helping adults become more educated about their rights and responsibilities as community members in the US and more engaged in their communities.

o We don't agree that these grants should be tied to the outcome of unsubsidized employment. The results of becoming a better citizen naturally lead to economic self-sufficiency.

o It's unclear about how the preparation for employment will be integrated with the civics education.

o It's also unclear as to how those in need of English literacy skills who do not have work authorization will be served.

· The frequency of monitoring and evaluations of programs in the current plan will impact our ability to use our time to best serve our students.

· Smaller programs like ours lack the resources to spend large amounts of money on administrative duties such as monitoring and evaluation.

· A minimum of quarterly evaluations seems excessive.

· Grantees will need a significantly higher level of funding to provide the number of hours of instruction needed to provide instruction based on the College and Career Readiness Standards (CCRS) and integrated education and training and the classroom space to do so (most grantees are in borrowed space in constant jeopardy of being lost to other priorities in public school or library buildings).

#### **Response to Comments 46, 47 and 49:**

**Thank you for your comment.** In regard to WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.

Regarding preparing adults who are English language learners for unsubsidized employment, WIOA title II, Section 243(c) requires the goal of programs receiving Integrated English Literacy and Civics Education funding to be designed for this purpose.

Regarding assessing quality, it has been determined that the level of assessment currently in the plan will increase communication with providers and will help programs meet goals established in requests for funding.

Regarding College and Career Readiness Standards, aligning of content standards for adult education with the Colorado Academic Standards is a required element for the submission of the Combined State Plan under the Workforce Innovation and Opportunity Act.

#### **Comment 48**

**Date/Time:** 2/9/2016 – 3:37:13 PM

**Who:** Spring Institute for Intercultural Learning

**Area:** Denver

**Plan Section:** VI Adult Education and Literacy Programs

**Comment:**

Spring Institute for Intercultural Learning greatly appreciates the opportunity to provide comments to the Colorado Workforce Development Council and congratulates the CWDC on the creation of a state combined plan for the State of Colorado. Spring Institute has continuously provided Title II-funded adult education services in Colorado since the Workforce Investment Act (WIA) was implemented in 1999. During these 17 years of funding, Spring Institute has been actively involved in task forces and working groups sponsored by the administrators of the Title II funding, the Colorado Department of Education office of adult education.

Spring Institute currently provides Title II-funded adult education services throughout the greater Denver area and customized English language and job skills training to a number of employers in the area.

Upon careful review of the Adult Education and Family Literacy section we have the following comments. We are happy to answer questions about any of these points and would appreciate the opportunity to participate in the revision of the Adult Education and Family Literacy section of the plan.

1. Continued Focus on Family Literacy: Spring Institute appreciates the focus in the plan on the need for the system to continue to deliver family literacy services that will provide caregivers sufficient skills to become full partners in the educational development of their children. While the greater alignment of Title II with other titles of the Workforce Investment and Opportunity Act (WIOA) is a welcome improvement to current Colorado practices under WIA, Spring Institute supports continued funding for adult education and family literacy services, with the new goals of building career pathways. However, there is no detail about how grantees can achieve required WIOA outcomes while serving parents of children who are not interested in and/or are not in a position to join the workforce.

2. Lack of Detail Regarding Better Alignment of Title II: While Spring Institute appreciates that the plan is not overly prescriptive in its approach, and that this approach may allow providers greater opportunities for innovation in their individual program designs, we nonetheless would have liked to see more detail in the adult education section of the plan, particularly in regards to how the state will overcome historically poor alignment between county workforce agencies (Title I) and adult education providers (Title II). The particular barriers facing adult education learners, including low literacy skills, low basic skills, and a lack of a high school equivalency diploma, often resulted in the inability of this population to benefit from the full services of the workforce system in the past, as the system was not incentivized to serve a population that would not yield short-term employment outcomes. Spring Institute would like to see more details in the adult education section on how the new workforce system would reduce “creaming” and better integrate adult education learners, including through the provision of wrap around services such as childcare and transportation in order to minimize barriers to participation.

3. College and Career Readiness Standards (CCRS): Spring Institute welcomes the focus on the CCRS, but is concerned that such an approach will not be appropriate for all community education sites. First, the use of CCRS will require increased levels of funding to allow us to provide the additional hours of instruction needed to meet the standards. Current Title II-funded providers in Colorado faced funding

cuts of 10% in FY2016, already requiring providers to reduce class locations or class offerings. Moreover, additional instruction hours needed to adhere to CCRS may prove unrealistic for many adult education learners. Adult learners often do not have more than five hours per week to devote to classroom instruction, due to employment, family and community obligations. Currently, five hours per week is the average number of hours of instruction among current Colorado AEFLA grantees, in comparison to the average of seven hours per day of a student in public education.

4. Integrated English Literacy and Civics: Funding for instruction combining English language literacy and civics has historically focused on helping adults become more educated about their rights and responsibilities as community members in the US and more engaged in their communities, while building their English language fluency. It is unclear how the preparation for employment can or should be integrated with the civics education, as these are two different goals and skill sets. Spring Institute would welcome more detailed information in the plan on how it will approach the new WIOA requirements for integrated literacy and civics instruction.

**Response to Comment: Thank you for your comment.**

1. In regard to WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.
2. Regarding partnership, local plans will address the specific local needs for partnership. Local one-stop partners are encouraged to identify strategies and approaches that best reflect the unique needs of the local workforce development area.

Ensuring focus on individuals with barriers to economic self-sufficiency is essential. This comment has been accepted a change has been made to the language in III.(b)(5)(B): for Title II (i).

Regarding childcare and transportation, without final regulations, it is not known if these are allowable.

3. Regarding College and Career Readiness Standards in regard to this comment, aligning of content standards for adult education with the Colorado Academic Standards is a required element for the submission of the Combined State Plan under the Workforce Innovation and Opportunity Act.
4. Regarding preparing adults who are English language learners for unsubsidized employment, WIOA title II, Section 243(c) requires the goal of programs receiving Integrated English Literacy and Civics Education funding to be designed for this purpose.

## Comment 49

**Date/Time:** 2/9/2016 – 4:04:00 PM

**Who:** Lezlee Cox

**Area:** Montrose

**Plan Section:** VI Adult Education and Literacy Programs

### **Comment:**

Montrose Adult Education Center has the following comments in reference to Title II Program Requirements in the State Plan:

1. All the focus is on youth and adults in need of postsecondary education, job training, and employment. There is no detail about how grantees can achieve required WIOA outcomes while serving parents of children who are not interested in and/or are not in a position to join the workforce. Traditionally this group of adults has been considered “most in need”, but seems to be marginalized in the Colorado WIOA plan and in the Adult Education and Family Literacy section.
2. These comments are related to the Integrated English Literacy and Civics grants referenced on pg. 153. These grants have historically focused on helping adults become more educated about their rights and responsibilities as community members in the US and more engaged in their communities. We don't agree that these grants should be tied to the outcome of unsubsidized employment. The results of becoming a better citizen naturally lead to economic self-sufficiency.
3. It's unclear about how the preparation for employment will be integrated with the civics education.
4. It's also unclear as to how those in need of English literacy skills who do not have work authorization will be served.
5. The frequency of monitoring and evaluations of programs in the current plan will impact our ability to use our time to best serve our students.
6. Smaller programs like ours lack the resources to spend large amounts of money on administrative duties such as complying with frequent monitoring and evaluations.
7. A minimum of quarterly evaluations seems excessive.
8. Grantees will need a significantly higher level of funding to provide the number of hours of instruction needed to provide instruction based on the College and Career Readiness Standards (CCRS) and integrated education and training and the classroom space to do so (most grantees are in borrowed space in constant jeopardy of being lost to other priorities in public school or library buildings).

**Response to Comment:** Please see the response after comment 47 on page 32 of this document.

## Comment 50

**Date/Time:** 2/9/2016 – 4:19:11 PM

**Who:** Philip Pauli

**Area:** Jefferson

**Plan Section:** General comments on individuals with disabilities - references data from II. (a)

### **Comment:**

RespectAbility – Public Comments – Colorado Combined State Plan Part 1

RespectAbility is pleased to submit the following comments regarding the current draft of the State of Colorado’s Combined State Plan as required under Section 102 of the Workforce Innovation and Opportunity Act (WIOA). We are pleased to have this opportunity to offer our comments, raise our questions, and provide our suggestions about the content of the state plan.

Colorado is already leading the nation in terms of expanding competitive, integrated employment for people with disabilities. According to the most recently, publically available Census data, Colorado ranks 9th in the nation as measured by the employment rate of people with disabilities. Fully 42.3% of the 267,600 working age people with disabilities are employed in Colorado. Because of your good work, the 15,700 youth with disabilities between the ages of 16 and 21 living in Colorado have increasing chances to successfully transition into the world of work.

Colorado has achieved these results through hard work and a dedication to best practices. It is joined by other states such as the Dakotas, Alaska, and Wyoming who have all achieved incredible results in terms of jobs for people with disabilities. We are also seeing pockets of excellence around innovative youth programs designed to address disability employment in Georgia, Nevada, and Kentucky.

The bottom line propelling these efforts is that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. 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. Colorado is already implementing many of these models that are proven to work, be cost effective to implement, and be successful. We have developed an extensive collection of data on disability and employment in Colorado. That information is attached to our comments.

Overall, there is a lot to commend about the current draft of Colorado’s Combined State Plan. From the strong partnerships with federal contractors around meeting their Section 503 requirements to the critical commitments to accessibility in American Job Centers, Colorado’s state plan engages with many of the most important workforce issues related to expanding opportunities for people with disabilities. However, no plan is perfect. Upon reviewing the current draft of the state plan there remain a few areas where improvements can be made to achieve the best results possible. Our public comments on Colorado’s WIOA State Plan are structured around those points where greater clarity, precision, and

data are needed to ensure that people with disabilities will be better equipped to pursue the American Dream.

1. Strong Sector Strategies- The need for strategic alignment of workforce development and economic development to expand employment for people with disabilities:

As required by WIOA Sec. 102(b)(1)(A) North Dakota's state plan must and does include a detailed analysis of the economic sectors of the state economy that are growing and are forecasted to grow in the future. The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.

The current draft of the Combined State Plan does a good job of assessing those industries which are the real drivers of Colorado's economy as well as those emerging career fields which will be critical in years to come. In terms of current talent demands as listed on page 11 of the Combined State Plan, the three largest industries in the Centennial State are "Trade, Transportation, and Utilities", "Government", and "Professional and Business Services". The State Plan then goes on to detail those industries that projected to experience "significant increases in projected statewide job availability." Those with the largest gains are expected to be: Professional, Scientific, and Technical Services adding over 79,000 jobs, Administrative and Support Services with over 49,000 openings, as well as Ambulatory Health Care Services, Specialty Trade Contractors and Social Assistance. Lastly, on page 13, the Plan discusses "emerging demand occupations" which include: "Healthcare Support Occupations, Healthcare Practitioners and Technical Occupations, Computer And Mathematical Occupations."

**Response: Thank you for your comment. Colorado appreciates your interest and recognition of the work already happening in Colorado to ensure individuals with disabilities have opportunities to pursue competitive integrated employment and the role of sector strategies in promoting their success.**

## Comment 51

**Date/Time:** 2/9/2016 – 4:22:58 PM

**Who:** Philip Pauli

**Area:** Jefferson

**Plan Section:** General comments on individuals with disabilities

### **Comment:**

RespectAbility - Public Comments Part 2

The rapid emerging talent needs in health care represent both a challenge and an opportunity for Colorado's workforce system. It is challenge propelled by an aging population resulting in increasing demand for qualified workers ready to fill the talent needs of hospitals, assisted living centers, and nursing home. It is opportunity to channel the incredible talents of people with disabilities into the workforce. This is a topic that needs to be examined closely and has implications for people with disabilities living in Colorado who want to work.

To quote a 2014 report from the Office of Disability Employment Policy (ODEP), “[people with disabilities] not only represent an untapped talent pool, but also offer significant value and insight” in the field of healthcare. Indeed, it is important for healthcare institutions to reflect their customers, and people with disabilities interface more with the healthcare system. There are numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living. Employers working in health and elder care can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities. There are numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elder care, and in assisted living.

These examples all reflect how the Project Search model is well suited to meeting Colorado’s growing talent needs in health care. As such, we recommend that Project Search be significantly expanded as they have done in Wisconsin, Florida and other states. Nationally, each year approximately 2,700 such young people, spread out in 45 states, do a nine-month, school-to-work program that takes place entirely at the workplace. This innovative, business-led model features total workplace immersion, which facilitates a seamless combination of classroom instruction, career exploration, and worksite-based training and support.

Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, the first longitudinal study of the program found “a 68% success rate in transitioning students from high school into competitive employment” and “Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall.” The goal for each program participant is competitive employment. We suggest that you look to follow the example set by the state of Wisconsin where they started with three Project Search sites and are expanding to 27. The experiences of the dedicated state officials, VR counselors, workforce professionals, and special educators who have increased Wisconsin’s Project Search programs offer profound insights in the steps necessary to make rapid expansion a reality. The future expansion of Project Search in Colorado should be in hospitals, hotels and elder care.

#### B. State hiring and state contracting can be a source of opportunity:

Given that government represents the second largest industry in Colorado, “employing 417,500 individuals” and “accounting for 16.5% of total employment”, it is critical that these openings be fully accessible to people with disabilities. There are many reasons for addressing this challenge and among them is the fact of demographics. Colorado’s state government will likely be impacted by the cresting wave of Baby Boomers retiring just as other sectors are being shaken.

As such, there are several steps that can be taken in order to address these opportunities. First, we would point to example set by other governors in other states who have used executive orders to encourage the hiring of people with disabilities for jobs in state government. Governor Inslee in Washington, Governor Dayton in Minnesota, and even Governor Snyder in Michigan have looked for ways to get more people with disabilities working in state government. This idea reflects a best practice first discussed in Governor Markell’s Better Bottom Line Initiative and later in RespectAbility’s Disability Employment First Planning Toolkit. In Governor Markell’s own words, “One key action is to set a state

goal for hiring people with disabilities through an executive order and hold agencies accountable for achieving that goal.”

Direct hiring need not be only way of doing this. We would also recommend that Colorado look at state contracting obligations as another way of encouraging the hiring of people with disabilities. Mirroring the requirements laid out in Section 503 could be a way to ensure diversity in the supply chain and services being supplied to state government. The untapped potential of Coloradans with disabilities is such that a full-spectrum, all-of-the-above-and-more approach is needed.

**Response: Thank you for your comment. Colorado agrees that the Project Search model can be an effective strategy for preparing youth with disabilities to enter into competitive integrated employment. As described in Section VI, Vocational Rehabilitation (E), in recent years, Colorado has operated 4 different Project Search sites. While a commitment to expanding Project Search cannot be made in the Combined State Plan at this time, Colorado workforce programs continuously seek to identify and implement effective and innovative options for meeting the unique service needs of each client and the Plan as written does not preclude an expansion of Project Search in the future if deemed appropriate.**

**Colorado further appreciates your desire to see a more proactive approach to hiring individuals with disabilities into state government jobs. While the Combined State Plan will not address such an initiative at this time, Colorado does encourage a diverse workforce, including the hiring of individuals with disabilities into state government jobs.**

## Comment 52

**Date/Time:** 2/9/2016 – 4:25:52 PM

**Who:** Philip Pauli

**Area:** Jefferson

**Plan Section:** General comments on individuals with disabilities

### **Comment:**

RespectAbility Comments Part 3

C. Leisure, Hospitality, and other high turnover job sectors:

Millions of dollars are lost each year due to employee turnover. For all jobs earning less than \$50,000 per year, the average cost of replacing one employee is between \$6,000 and \$20,000. Research shows that employees with disabilities, when their interests and abilities are aligned with the needs of employers, are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of disability accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities.

“Leisure and Hospitality” represents a significant slice of Colorado’s economy, accounting for 314,700 jobs as estimated by the Colorado LMI Gateway. Further, “Sales and Related Occupations as well as Food Preparation and Selling Related Occupations account for 11% and 9% of the state’s employment

respectively." All of these jobs tend to have very high turnover rates and numerous studies show that people with disabilities can be outstanding in those fields and have significantly higher employer loyalty. The loyalty, productivity, and retention rates of people with disabilities can significantly contribute to employers' bottom lines.

To focus in on hospitality, Missouri offers an outstanding example of the type of work that is needed. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers has launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses' Workplace Initiative could easily be part of your overall Sector Strategies.

Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Colorado to improve employment outcomes for people with disabilities. Colorado's workforce system should connect with employers in the tourism sector to begin figuring out how to benefit from these models.

#### D. Science, Tech, Engineering and Mathematics (STEM),

Lastly and perhaps the most exciting opportunities for improving employment outcomes for people with disabilities is in the fields related to STEM jobs. As the State Plan itself says on page 15, "the occupations identified in Colorado's "Top Jobs" list, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields." Further, "the Colorado Talent Pipeline Report found that 62 percent of the occupations are STEM-related." We are glad to see a focus on creating a pipeline to feed these talent needs and we would like to encourage Colorado's workforce system not to forget about people with disabilities.

As has been documented in many cases, there can be an "Autism Advantage" in the STEM space. Indeed, some people on the Autism spectrum can have the very best skills in science, math and engineering. Microsoft, SAP, and Specialisterne have committed themselves to "provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists."

Delaware's Governor Jack Markell is partnering with companies to employ more people on the Autism spectrum in STEM jobs. Such examples need to be implemented by Colorado well. 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 designed to ensure people with disabilities have the chance to become future scientists, engineers, doctors and mathematicians.

Ensuring the Accessibility of Science, Technology, Engineering and Mathematics (STEM) Programs and Careers for People with Disabilities, especially Students with IEPs, is vital. As Carol Glazer of the National Organization on Disabilities wrote in Huffington Post, "America is already lagging when it comes to

STEM-skilled workers. The U.S. will have more than 1.2 million job openings in STEM fields by 2018.” The need to fill STEM talent goes far beyond just federal contractors. In New York State Governor Cuomo has ensured that magnet schools for STEM are located near IBM, a major STEM employer in their state. Colorado can and should follow this model.

**Response: Thank you for your comment. While a commitment to develop any specific initiative, such as the Poses Family Foundation’s Workplace Initiative will not be made in the Combined State Plan at this time, Colorado workforce programs continuously seek to identify and implement effective and innovative options for meeting the unique service needs of each client and the Plan as written does not preclude identification and implementation of other strategies in the future if deemed appropriate. The Division of Vocational Rehabilitation and the workforce development system as a whole, have identified goals and strategies that support the exploration and implementation of appropriate initiatives, including work-based learning experiences and sector partnerships.**

### Comment 53

**Date/Time:** 2/9/2016 – 4:26:08 PM

**Who:** Adriann Wycoff

**Area:** Denver

**Plan Section:** VI Adult Education and Literacy Programs

**Comment:**

WIOA Comments: Metropolitan State University Family Literacy Program

Reported by Elizabeth Schroeder & Maureen Rudy

Co-coordinators & Instructional Specialists

Director: Adriann Wycoff, PhD

MSU Denver Family Literacy is attuned to the inclusion of Family Literacy in the Adult Education provisions as stated by the WIOA draft document. Program comments focus on three key aspects as enumerated below; program provider collaboration for continuum of educational achievement, access and resource allocation for LEP immigrants and refugees, a data driven picture of state populations in need of services.

#### Collaboration

Colorado’s State Plan only briefly references the need for partnership and collaboration among service providers, outlined in project #8 of the AEI’s State Leadership projects on page 155.

Dedicated time and resources to support collaboration among regional AE providers is key to building clear and active partnerships, resulting in articulated pathways for learners. In the plan, webinars, and public meetings, we have heard the messaging of “pathways” and “no wrong door” for learners; however, this still seems misaligned with core workforce outcomes. In building the “talent development system,” core partners (AE providers) must be engaged to build these navigable pathways with defined entry points and on-ramps for adult learners from basic services to employment/higher education.

Historically, programs have operated in isolation, concerned with their respective quantitative measurement outcomes, such as learners per year and learning gains, and had created a competitive environment and lack of collegiality. The opportunity presented through the re-imagining of how adult education service are delivered throughout the state should aim to connect and define collaborative efforts.

In our opinion, further definition of how these collaborations will develop is needed in the plan; as is information on how the AEI office will assist providers through funding and professional development.

#### Meeting the target outcomes

MSU Denver Family Literacy program has developed a curriculum that fully integrates CCRS, CASAS competencies, core learning skills, language instruction, and transferable soft skills through our project-based (service) learning model. We are confident that core skills developed in our program will serve students well with life and work skills that can lead to future career pathway programs. While we are grateful that family literacy is well represented in the State Plan, we desire to see clear indicators focused on programs that serve as initial entry points and on-ramps to pathways.

Point of entry programs that address LEP populations, those with interrupted education, non citizens and parents of young children are critical to building a strong network of services that identifies gaps. It is imperative that these services address the needs of those adult learners who have the greatest barriers to self-sufficiency.

Network-based supports could include development of accessible service provider map and referral processes that help learners find the right fit for their current needs, or “meeting students where they are.” A comprehensive approach aims to decrease attrition, increase retention and more effectively transition within the network. This effort would include strengthening and leveraging community-based programs (churches, libraries, nonprofits etc.) and defining potential pathways for learners.

#### Data-driven allocation and resources reflective of Colorado’s current needs

Colorado should provide equitable access to services for adult learners who are identified as high-needs, as defined by prior comments, to ensure state residents are not divorced from opportunities to receive educational services. It is critical that the state use comprehensive, accurate data (U.S. Census and others) to project the expected representation of high-needs individuals, consider and identify the affiliated costs of service designs to meet WIOA requirements, and that labor and education negotiate and defend performance goals that would permit diverse learners fair access to services.

**Response: Thank you for your comment. Colorado strongly values career pathways and views their development and implementation as a core component of our strategy for workforce development. We have been in the process of developing a statewide Career Pathways Framework and, due to the timing of that effort, it was not referenced in the first version of the state plan released in January 2016. An overview of our Career Pathways Framework has been added to section II of the Combined State Plan**

Regarding defined collaborative efforts, the State Plan is not the appropriate vehicle for building collaborative efforts between individual organizations because this can and should look differently between local areas. The state encourages local areas to address this in local plans.

Regarding how funding will be made available, without final regulations, we cannot yet develop the request for proposal which will outline funding priorities under WIOA.

Regarding WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.

Regarding service providers and referral, we believe that local plans will address the specific local services available and about most effective means for referral. Local one-stop partners are encouraged to identify strategies and approaches that best reflect the unique needs of the local workforce development area.

## Comment 54

**Date/Time:** 2/9/2016 – 4:26:38 PM

**Who:** Philip Pauli

**Area:** Jefferson

**Plan Section:** General comments on individuals with disabilities

### **Comment:**

RespectAbility Part 4

2. Busting stigmas, myths, and misconceptions should be a key part of our state's overall workforce strategy:

Low expectations and misconceptions are critical barriers to employment for people with disabilities. A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent. Similarly, a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees. We therefore recommend that Colorado's State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas. Indeed, we know that other groups of Coloradans with barriers to work also face stigmas, especially those leaving the corrections system. Having a serious, systematic and ongoing communications campaign that highlights the benefits of inclusive hiring must begin if Colorado wants to maximize its success.

Indeed, the best way to fight stigmas is to let employers see the facts from other employers who are already succeeding by hiring people with disabilities. In terms of potential employer partners, we encourage your state plan to look at the Disability Equality Index that assesses the inclusion and hiring efforts of major employers. It was put together by the United States Business Leadership Network (USBLN) which operates a network of affiliates across the country that can be an incredible resource for your work. However, it should be a much larger component of Colorado's planning and implementation of a serious business-to-business PR effort. The companies which scored 100% in the USBLN index can

be a great resource. These are Ameren Corporation, AT&T, Booz Allen Hamilton Inc., Capital One Financial Corporation, Comcast, NBCUniversal, Ernst & Young LLP, Florida Blue, Freddie Mac, Highmark Health, JPMorgan Chase & Co., Lockheed Martin Corporation, Northrop Grumman Corporation, Pacific Gas and Electric Company, PricewaterhouseCoopers LLP (PwC), Procter & Gamble, Qualcomm Incorporated, Sprint Corporation, Starbucks Coffee Company, and TD Bank N.A.

Polls and focus groups show that there are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

A. CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines. This is best done through business-to-business success stories. While there are few Stephen Hawkings — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.

B. Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty. Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they don't know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Colorado's VR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as does ASKJAN.org, USDOL and others. Partners like the Poses Family Foundation Workplace Initiative can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. The National Organization on Disability and the U.S. Business Leadership Network offer strong resources.

C. People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have an PR campaign that will inspire Coloradans with disabilities to reach for the stars.

**Response: Thank you for your comment. Several goals of the Colorado Workforce Development System and the Division of Vocational Rehabilitation are consistent with the interests described in this comment. In particular, strategies 4.2 and 4.3 on page 46 are supportive of ensuring clear, common messaging is used to highlight key aspects of the system's vision and strategies, including the value individuals with disabilities bring to the workforce. DVR's goal to build and strengthen stakeholder relationships to increase employment opportunities for individuals with disabilities includes strategies that will enhance business awareness of hiring individuals with disabilities and providing technical assistance to business to promote these practices.**

## Comment 55

**Date/Time:** 2/9/2016 – 4:26:58 PM

**Who:** Philip Pauli

**Area:** Jefferson

**Plan Section:** General comments on individuals with disabilities - references data from II. (b)

### **Comment:**

RespectAbility Comments Part 5

3. Use the best data points, including the Labor Force Participation Rates of people with disabilities v. those without disabilities, as performance metrics.

On page 19 of the current draft of Colorado’s State Plan, there is a section dedicated to talking about “Individuals with Disabilities.” It begins by discussing how the most “intractable barrier underemployed or unemployed Coloradans with disabilities face is an overemphasis on what is expected that he or she cannot, should not, or is not doing.” This comment reflects the fact that stigma is a critical barrier to employment one very much worth the attention of Colorado’s workforce system. Further, we fully agree that “a focus on functional limitation rather than on the person’s talent and ambitions is expensive and wasteful.” Above all, we want the talents of people with disabilities to recognize and channel into the economy. We are also pleased to see the statement that “The workforce development system in Colorado is committed to providing the high quality services necessary to prepare individuals with disabilities to compete for jobs and fully participate in Colorado’s workforce.”

While we are pleased to see stigmas discussed and written commitments made, this section is of very limited utility without extensive statistics on the disability community in Colorado. Precise numbers and clear data is needed if Colorado’s workforce system is to evolve to overcome the barriers to employment created by disabilities. To quantify the challenge of empowering more people with disabilities through the transformational power of employment, we recommend that this section of Colorado’s Combined State Plan be amended to include some of the most important data points related to disability employment. For example, beyond just reporting the number of Coloradans with disabilities served by VR, this section could include statistics on the number of youth with disabilities as well as working age people with disabilities. As we reported in the introduction to our public comment, there are 267,600 working age people with disabilities and 15,700 youth with disabilities living in Colorado. Further, there is a 35 point gap between the labor force participation rate of Coloradans with disabilities and those without disabilities.

This then feeds into another critical point of feedback that we have regarding Colorado’s Combined State Plan. It is vital that Colorado’s workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking at unemployment information in isolation causes decision makers to miss the bigger picture of those individuals with barriers to employment who are not actively seeking work. Additionally, while it is very important to see when and if a person who approaches the workforce system gets a job, it is even better when systems can be created that enable people to get jobs and careers on their own. As an example of the data that is needed, we are including a link to, and a copy of, the presentation our

organization has compiled about employment for Coloradans with disabilities. This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work being done in Colorado.

Further, while Colorado currently ranks 9th in the nation in terms of the employment rate for people with disabilities, it is still critical to look at the experience of those with disabilities who are succeeding in the world of work. From the data, we find that only 48% of the 23,300 Coloradans who are blind or have vision loss are employed while 56.8% of the 36,600 with hearing differences are also employed. Given the flexibility and availability of assistive technology solutions, the employment rate for this subgroup should be much higher. Many people who are blind or deaf have incredible talent potential that can be unleashed by something as simple as a smartphone. Sadly, we also see that only 27.6% of Coloradans with intellectual or developmental disabilities are employed. For this demographic, workforce solutions may take more time and resources. However, there will be a considerable return on investment if Colorado's workforce system expands successful school to work transition programs. Colorado already has some outstanding Project Search sites creating career pathways for youth with disabilities. However, there is a considerable need to expand the number, scope, and diversity of such sites. We have more to say on this point later in our public comments.

**Response: Thank you for your comment. Because additional information about how many Coloradans experience disability and their level of participation in the workforce are important considerations when planning key strategies of the workforce development system, additional statistics highlighting this information have been added the plan.**

## Comment 56

**Date/Time:** 2/9/2016 – 4:41:59 PM

**Who:** Anna Mae Lindsay

**Area:** Alamosa

**Plan Section:** General comments on Adult Education and Basic Literacy

### **Comment:**

The following comments are submitted on behalf of CAEPA (Colorado Adult Education Professional Association).

Many of the board members and membership of CAEPA have been providing adult education and family literacy instruction in the State of Colorado since the inception of WIA in 1999. Many of the educators around the state have years of experience and education in the area of professional development.

Comments:

1. What can be expected, in the form of alignment, between workforce agency's and adult providers that would be different under WIOA from the current partnerships/relationships.
2. It is our perception that more detailed information would have to be in place about partnerships and alignment with other programs for this combined plan to be in place. How will this be done? Will the MOU be sufficient for this, and how will this be implemented?

3. Learners with the most barriers and those "most in need" have not been addressed in the plan. What will happen to those students who have "fallen through the cracks", are non-traditional, and need more time and services?

4. In order to provide the number of hours of instruction to achieve the required outcomes, programs will need a much higher level of financial support to continue serving adult education programs using standards-based instruction. How is this going to be achieved?

5. How does the state plan provide for Title II providers to serve on local workforce boards and address alignment and capacity building?

6. Stronger definitions are needed around -populations served, outcome measures, partnerships, use of navigators/coaches and how programs will be funded.

**Response to Comment: Thank you for your comment.**

1. Local plans will address the specific local needs for partnership and will better define what alignment will exist between one-stop partners. We encourage local one-stop partners to identify strategies and approaches that best reflect the unique needs of the local workforce development area.
3. Ensuring focus on individuals with barriers to economic self-sufficiency is essential. This comment has been accepted and a change has been made to the language in III.(b)(5)(B): for Title II (i).
4. Regarding how funding will be made available, until final regulations are published, the request for proposal which will outline funding priorities under WIOA cannot be developed.
5. Regarding local workforce development board representation, Title II representation on local workforce development boards is essential, but the State Plan is not the appropriate vehicle because Title II representation is already required as stated in Section 107(b)(2)(C)(i) of the Workforce Innovation and Opportunity Act.
6. Regarding WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.

## Comment 1

**Date/Time:** January 21, 2016

**Who:** Frank Waterous

**Area:**

**Plan Section:** General comments on Adult Education and Basic Literacy

**Comment:** general comments

Thank you for the opportunity to present this public comment. I am Frank Waterous, senior policy analyst with the Bell Policy Center. The Bell is a non-partisan, nonprofit research and advocacy organization founded on progressive values and dedicated to making Colorado a state of opportunity for all. The Bell is also a member of the Skills2Compete-Colorado coalition, which served as a focus group in the development of the draft state plan. We have five comments to offer on the draft plan today. We will also be providing these comments in writing through the formal submittal process before the February 9, 2016, deadline.

First, we are pleased with the strong emphasis in the draft plan's strategic vision and goals on creating a customer-centric, holistic workforce system in our state, driven by a "no-wrong-door" philosophy. To achieve this goal, the plan correctly identifies the need for cross-education and training of staff on different programs, resources and processes, as well as the importance of engaging staff at all levels on how to strengthen the system and make it work better for all concerned. However, one area on which we would like to see more system-wide emphasis in the plan is the use of "navigators" or coaches — an approach that has been highly effective in helping customers find their way through a variety of complex systems and achieve successful outcomes. The navigator role is discussed in the plan in conjunction with how some of the core programs and partners perform their work. However, it is not identified as a strategic opportunity or potential best-practice for the system as a whole. We believe that the plan needs more explicit discussion and emphasis on the role of navigators as a system-wide strategic innovation that would lead to increased customer success.

**Response: Thank you for your comment. It is recognized that navigators have been used successfully in Colorado in a variety of ways to support individuals enrolled in one-stop partner programs. The State is open to exploring expansion and support of this type of model in connection to strategy 2.2.**

Second, an essential component of a customer-centric system that serves individuals in a holistic fashion is the provision of Supportive Services, such as child care and transportation, through a "two-generation" approach focused on addressing issues many of these individuals and their families face in overcoming barriers to education, training and employment. Supportive Services are discussed in a variety of places in the draft plan, primarily in relation to the activities of particular core programs and partners. However, the plan does not address the significance of, or the state's proposed support for, Supportive Services as a crucial strategic priority for improving the system and helping more customers succeed. We urge you to incorporate a more detailed discussion of a two-generation Supportive

Services approach in the plan, including specifics on its importance for achieving the state’s system-wide vision and goals, and on how such services will be supported and provided system-wide.

**Response: Thank you for your comment. The state is very interested in applying two-generation approaches to workforce development. The Colorado Workforce Development Council and the Colorado Department of Labor have participated in the development of the 2Gen Policy Action Plan being led by the Colorado Department of Human Services. Due to the timing of that initiative, the state is open to discussing in more detail the application of two-generation strategies in a plan modification rather than at the present time.**

Third, WIOA provides an increased opportunity for, and places a strong emphasis on, the development and expansion of Integrated Education and Training (IET) programs. IET programs combine adult education and literacy instruction with postsecondary career, technical and occupational coursework. They have proven highly successful in helping low-literacy, low-skilled adults complete postsecondary credentials and successfully enter the workforce. Yet, despite the importance placed on these programs in WIOA, there is only minimal mention of them in the draft state plan, especially regarding their role as a key strategic element in a collaborative and integrated workforce system that connects all core programs and partners. This is a significant weakness in the draft plan. We urge you to include explicit and detailed information in the plan on the strategic importance of IET programs for the state — as well as specifics on how various core programs, partners and other key parties will encourage and support their expansion, use and connection to career pathways.

**Response: Thank you for your comment. The state will explore the expansion of IET programs in relation to these goals and will consider including explicit details as a part of the two-year modification.**

Fourth, another key provision of WIOA is the “Priority of Service” for adults who are low income, public assistance recipients or basic skills deficient. This provision is critical for ensuring that those with the greatest needs are served by our workforce system. Priority of Service is mentioned in the draft state plan, and a link is provided in the required assurances to the state’s recent Policy Guidance Letter on Priority of Service for Title I Adult Programs. However, given the importance of this provision in WIOA, we believe that the details of how the state will implement, deliver and ensure Priority of Service for these individuals should be given much fuller and more explicit discussion in the body of the plan itself.

**Response: Thank you for your comment. Language has been added to the state plan regarding the Adult Priority of Service. However, specific details about how this policy will be applied will be determined by local workforce boards and will be addressed in local plans.**

Fifth, the draft plan rightly identifies Colorado as a leader in the development of sector partnerships and career pathways. It also notes the state’s intent to continue its work in these areas. However, specifics on what the state has done and what future steps it envisions to expand sector partnerships and career pathways — and to link all core programs and partners into these efforts — are lacking in the draft. We

believe that the plan would be strengthened by the addition of more detailed descriptions of the state's current accomplishments and future goals in its sector partnership and career pathway efforts.

**Response: Thank you for your comment. An overview the state's career pathways framework has been added to section II of the plan.**

As a final note, one further issue will be vital for ensuring that the vision and goals outlined in the draft plan can be achieved. Stated simply, the state must support maximum flexibility in rules, procedures and the use and blending of funding streams in order to encourage the type of innovation needed for success. To the fullest extent possible, the state's commitment to such program and funding flexibility should be clearly stated in the plan. Thank you again for the opportunity to share our thoughts with you today. If you have any questions, or if I can provide further information, please contact me at (303) 297-0456 or [waterous@bellpolicy.org](mailto:waterous@bellpolicy.org).

## Comment 2

I am Chaer Roberts with the Colorado Center on Law and Policy and I'm Coordinator of Colorado Skills2Compete. First a confession, I actually haven't read the plan yet so I probably shouldn't be here making copies or making any comments but I did want to based on the quick scan regarding of what we have been up to. We will be submitting written comments but I want to mention a couple things. Colorado Center on Law and Policy is currently behind the state house bill 1050 which proposes an inter agency task force between CDLE and Department of ed, dep of higher ed, dep of human services as well as community stakeholders, and parents to look at does the lack of child care hold people back in terms of accessing skills training. So, as soon as I had the WIOA plan I thought let me see what the WIOA plan says about child care and it showed up in 4 sentences in 330 pages so, we'll probably be making some comments about how can that can be beefed up a little.

**Response: Thank you for your comment. Colorado understands the need for childcare support for low-income single parents to effectively pursue training and work opportunities. It is one of many barriers that individuals face and an issue that will be addressed through the implementation of Strategy 2.2 and Strategy 3.1.**

We think while we are requiring a policy to really prioritize people with barriers to employments when I read so far, it does seem like there is more to be said both on the data sections on who are the folks with barriers, who are the homeless, what are their ages, backgrounds, and there is a little bit about how many singles parents, etc, but just some bare data and not a lot narrative of what this population looks like in Colorado. Also, some of you know that we received a grant to look at WIOA and on how to serve homeless in Colorado, and I did a word search about the word homeless and I did notice that it was mentioned a lot more frequently than the word child care, about 20 some times, and about a third of time it was in regards to homeless veterans, and I think if we look at how about services to veterans are talked about in the plan, is really fleshed out what it really means to prioritize veterans you know, it may mean that they are counselors

who are veterans, or they have access to certain programs if they are veterans. When we look at the sections on other folks with barriers to employment that had to be prioritized it seems that just, and again I haven't read every word, it seems just to be saying that federal law requires prioritizing this group so we will be working on some language in terms on how it may be to flesh out, what it does looks like, how to workforce centers prioritize folks with barriers for employment, I think is done in some of the sections on how to prioritize veteran services but not necessary with some of the others groups. Thanks.

**Thank you for your comment. The plan will be modified to include the following question and answer: (4) Adult Priority of Service: Describe how the State will implement and monitor the priority for public assistance recipients, other low income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.**

**Colorado has issued Policy Guidance Letter WIOA-2015-07: Priority of Service for Title I Adult Programs that provides detailed guidance to local areas regarding implementation of Adult priority of services. This guidance includes definitions of the priority groups, identifies how veterans priority of service interfaces with adult priority of service, sets a minimum goal of 51% of adult enrollments meeting priority definitions, and requires local boards to create local policies that must include:**

- **Local procedures for determining priority during the eligibility process and enrollment;**
- **How the local area will define "low income" (it may be more stringent than the state definition in this PGL) and the relevant data used to establish the definition;**
- **What criteria and procedures will be used to assess priority for basic skills deficient individuals;**
- **Any local requirements, such as residency, that will be established in relation to the four priority groups;**
- **Any local discretionary priorities that will be established in addition to the four targeted groups, the data to support the need for the local priority, and the documentation that will be required from an individual for the local priority; and**
- **Local procedures for internal monitoring of the goal to serve 51% of Adult participants from the priority targeted groups.**

**The Colorado Department of Labor and Employment will add the Adult Priority of Service requirements to its annual compliance monitoring review of each local area within the state. PY15 will be a base building year with technical assistance provided by the state, and PY16 will serve as the first compliance year for meeting the 51% goal.**

### Comment 3

I want to focus on a very narrow area that is related to goal number one. First I want to say a word about Tom Miller and Associates, it turns out that I have known Tom for about 16 years, when I was at the University of Indianapolis and he is just a superb strategist and tactician. I think we will do well by having Tom Miller and Associates working with us here. My issue has to do with the credentials component on point one and goal one. I would like for you to just think about making sure as we develop the policy around that, that we think about the statewide bank into which this credential will be deposited. Here is where the self interest comes in, I think the

community college system in Colorado is a place to consider among others as where to deposit those credentials, particularly badging. Either one of the problems that arise in badging is when people talk about badging, 5 years later they may not know where the badge is or the badge depository may be gone. We know that the Colorado Community College system is going to be around for a fairly long time, if not as long as the state itself, and so I urge us to think about having all the Colorado community college system as a potential depository for credentials for individuals as they go to the workforce training. Because as most of you know here that eventually we will train people coming to the community college either at the beginning or at some point of their careers to retrain and to be a part of the growth of their own professional development, so it is just something to think about. My name is Edward Freeman and I'm the President of Community College of Denver.

**Response: Thank you for your comment. The state looks forward to engaging stakeholders, including community colleges, in the discussion badging as a part of the strategies referenced.**

#### Comment 4

My name is Jessie Hawthorn and I'm the adult education program manager at spring institute, however, spring institute for intercultural learning is a nonprofit in Denver. My comments don't reflect haven't been supported by the institute so they are my comments and they do not reflect the institute. So, I would have probably been more involved in the focus groups and other things around the state but I was at the department of education for 6.5 years and then I left and so I decided to hide away for a while and I was teaching refugees so I wasn't involved in a lot of the development of this but I have been very familiar with adult education services under WIA. I'm fairly new to the department of labor things and the sector partnerships, I kind of stayed on the periphery of that but paid attention to it. I do really like the goals particularly goals three and four, the ones that I feel like adult education programs can really get behind and understand and be part of. Especially the continued professional development and aligning, working on messaging. However I didn't read every core program sections, I just read target areas, I did read the adult education part really carefully. But the one thing I want to say about that is that a lot of it looks very similar to the previous state plan and I was implementing that when I was at the department of education so, it seems kind of copy and paste from the previous state plan and all of the webinars and things that I've done learning, National Skills Coalition things and Skills2Compete and there is really innovative great things that I think are happening under WIOA but I just saw some talk about that in the adult education program but I didn't see that core program description but I didn't see that reflected in it, and so my concern is that I don't know when that might be more detailed but I just have a lot of concern about that and I also think there's things in place already that are overlooked that for example on p. 155 talks about the development of the quality indicators and programs quality standards, and that already exists and I think to start from scratch on some things like that I have already have been invested in, that are good and also the other thing I just want to make a point because I will submit more comments in writing, is the most in need that we used to talk about in the department of education and Frank, Chaer and other people have mentioned that and kind of seems not to be in there. In adult ed and maybe in the local workforce centers there is this idea of cherry picking, and unfortunately when you cherry pick you meet your outcomes but really don't serve those with the highest barriers to employment and education so, I echo the comments about the child care

and transportation because we know in adult education when we offer classes around the city, which we do for around 500 people, if we don't have childcare available and they don't have access to transportation they won't come to our classes so this is a very important component. Also, the people with learning disabilities are the ones with the greatest barriers and the people that can't pass the current GED they're really struggling with literacy, is much easier to get stackable credentials to those people who already have those skills. It is much more difficult for those of their students and I see not enough time built in and not enough support and that's what I want to focus on.

**Response to Comment:**

**Thank you for your comment. In regards to childcare and transportation, without final regulations, it is not clear if these are allowable.**

**Regarding WIOA performance measures, since the time of release of this State Plan draft, the State has received guidance from the United States Department of Education that five of the six performance measures will be baseline for 2016-17 and 2017-18. Without baseline targets established and without final regulations, it cannot be specified as to how programs may meet targets.**

## Comment 5

I am Katrina Wirth with the Center for the Workforce Initiative at the Community College of Denver and also a member of the DWD Board so as a member of that board I want to say thanks to the CWDC and their consultants for all the excellent work you have done in the plan. Two quick comments that strike me as I was reading through it: one is a request, I love the goal about the alignment of business services as someone who works at college who tries a lot demand in education and participates in several sector partnership that align across partners. I think is key to request that Community College system is not a required partner in this plan but we would love to see ourselves included on that aligned work because we don't want to step on each others shoes I think we can go further together and assuming that the local and regional plans will provide more on that, we explicitly mention on that and the state plan is more likely that they will include us in that conversation so we love to be there for that and also we just underscore some of the comments around hoping to see a bit more innovation detail in the adult education piece particularly around basic skills, integrated programs, really an opportunity for adult ed and workforce to integrate as far as working side by side so hoping to see more detail on that on the regional plans on even a greater emphasis on that on the state plan. Thanks for the great work that's already been done.

**Response: Thank you for your comment. Sector partnerships need public partners in the conversation to be successful and the state encourages participation by community colleges. The local and regional plans will provide more specific details on how these partnerships will be implemented and how innovation will drive various programs.**

## Comment 6

I am Lorrie Toni, I'm the Perkins director. I work at the Colorado Community College system but I'm not here as a representative of the Colorado Community College system, I don't think they even know I'm here...Oh there's my boss! So they know I'm here. Anyway these are my opinions and thoughts and they shouldn't be misinterpreted. Some concerns I have, again I only read the first 73 pages. I will share typos, I'm really good at finding those. As a citizen of Colorado it's not clear to me if all the services are available to undocumented individuals and I think that should be clear for the public information. I will say that I love the plan, I think you are doing a great job, I love the integration and cooperation, and alignment. I think that's what needs to happen for people to be successful in careers. Sometimes when we let business be the fulcrum, if they're in a I need workers now status they'll take workers out of our programs before the students can get certificates, so it would helpful if business also understood some of our needs to prepare these people for all their lives and just not that one job. Also, part of the challenge we have in Community College with Perkins funds is the non-traditional careers metric which you would think that's about all the minorities are under represented populations and in Perkins it is only about gender, and we have been trying to work on gender stereotyping for careers since 1998 and that's the last century, and one thing we will realize is that it cannot be done by Lorrie Toni all by herself, it cannot be done just by the community college system, it has to be a state wide, a nationwide concern and attention that we deal with those biases that we have that we are not aware of, everyone has them and it takes training and attention to learn how to became aware of the and how to overcome them and make sure that all citizens, each and every one of them has an opportunity for great careers. I saw a little bit in the plan, I haven't read the all plan, but some talk about those low-paying jobs and I really ask that we think about career pathways, a low-paying job can be the beginning. My example because I have a degree in automotive tech I think of a lot boy and I'm not going to say a lot boy I'm going to say lot person, somebody working at a dealership could become an assistant automotive technician, could become an automotive tech, could become a mechanical engineer so we need to think it is not done a job is not the end, it's the beginning and I would just like to feel this more in the way the plan is written. I would like to hear they would be more detail and as I run across more typos I'll submit them on the website.

**Response: Thank you for your comment. Colorado's statewide framework for Career Pathways has been added to the plan, which speaks to the progression and possibilities that are referenced in this comment.**

## Comment 7

My name is Keith Balk and I'm with a company called Strive. I would urge we focus on innovation and on making things easier for jobseekers and education seekers. When people are trying to find jobs there is a really a lot friction in the system, in order to sign up you have to fill out pages and pages of documents and it is hard to find and even understand what are the options and the jobs filters and you don't know what you are missing. I would encourage explicit language around innovation and here is where my self serving par is coming in. Strive is a mobile app that allows people to find jobs with their phone near to their home so it's shows jobs

on a map so, a system like that with mobile focus is really easy to use and I think it would be valuable for job seekers.

**Response: Thank you for your comment. Technology is critical to success in our system moving forward and the state is open to exploring innovative options that will support the goals of job seekers and employers.**

### Comment 8

I am Anna French and I am a rights advocate for two federal grant programs, a client assistance program, protection and advocacy for beneficiaries of social security and I work for Disability Law Colorado which is a state protections advocacy system, and we are all mandated to do this under the congress. I work with client complaints under the rehabilitation act so basically DVR and Independent Living Centers and employment network. I haven't had much to do with the workforce centers themselves, and we are not clear on what we can do but WIOA changes a lot of things for some so we heavily anticipate the regs coming out. This is what I see, I'm the front line person my ability to affect systemic issues is really rather limited but what happens is someone with independent living centers or employment networks, and I hope you all know what is that or I'm sure you know somebody who does, comes to me and they have a complaint about one of those entities and I have to investigate and see if I need to represent them in an appeal, grievance. After all the wonderful system statements are made about ideals, mission, values; all the broad talk we are dealing with human beings; my slice happens to be people who have disabilities, which includes people with transportation issues, child care, homelessness, how do you throw equipment to someone who is homeless and expect them to keep that safe when they can even take a shower. So, at end these are real people that are being affected and I would love to see the ideals actually filter down to them, you made a lot of wonderful, needed comments. The things I run to in the course of complaints and the systems I deal with aren't necessarily as willing to assist or able to assist because implementing policy is not friendly to those issues, and I really want to make sure that we understand what we are dealing with because I'll be dealing with the outcome of WIOA along with the rest of you. We have to understand that these are people who have had a variety of challenges, serious live challenges and they want to work. Why? To sustain themselves and also there is a huge amount of self esteem in people who can take care of themselves in this country, and too often I have to fight to get one of those entities to abide by the very mission and values statements that they make. Because when it comes down to the rubber meeting the road they have all kinds of reasons as to why they cannot or will not do it and they can justify it and that lands me in appeals. That's all I want to say. Thank you

**Response: Thank you for your comment. It is our intention to infuse all levels of the system with the ideas and values and practices discussed in the plan.**

### Comment 9

I'm Marcia Wynn with the Community College of Denver and I'm the state grant coordinator for that program. So I've been working from the beginning with adult education all the way through people finding a career, a job in a career pathway. I just have a comment, I have not had a chance to read a lot of the state plan but I've been involved in a lot of different meetings, so I just want to say let's be clear with the partnerships and how they're formed. Who are those partners, how we find them, and how we create those partnerships without getting involved in politics, and I really want some help with that and I hope the plan includes it. I also would like to know how state funding may be integrated into the WIOA funding

**Response: Thank you for your comment. WIOA requires new MOUs to be developed between workforce boards and partners, which will help bring clarity to partnerships. State funding for Adult Education is integrated into WIOA funding by aligning practices and activities, such as career pathways, that should be pursued by grantees.**

## Comments Received on the Proposed Performance Targets

### Comment 1 – Colorado Center on Law and Poverty

In reviewing the proposed Performance Indicators for the State WIOA Plan, the primary concern and question that arises is how services and related outcomes to different priority and “hard to serve” populations in the legislation are measured and included. It seems that such service categories as Vocational Rehabilitation, Dislocated Workers and Wagner-Peyser do not have measureable targets. These are specific areas that would often be accessed by these populations, especially since many individuals in these populations have significant work barriers. There is a need for more guidance for how effective services for “hard to serve” populations are delivered and measured quantitatively.

It is also unclear how priority populations are incorporated into the overall outcomes of the State Plan, and how workforce systems track the number of “hard to serve” individuals who are served. We recommend that more specific targets and indicators be inserted so that appropriate data is collected and reported from the beginning of an individual's participation. The State Plan should ensure that these priority populations are accessing workforce services, that services are responsive, and that positive outcomes are achieved. We recommend that state and local plans specify mechanisms and criteria for identifying “how to serve” populations during the intake process

Specific recommendations include:

1. Include language in the state plan that says: “insert specific targets for how many ‘hard to serve’ individuals (including those who have experienced homelessness) access services, with suggestions for innovative outreach strategies for this population
2. Add language: “specific targets should be developed for the number of individuals from the homeless and other ‘hard to serve’ populations that are served in the different categories of Adults, Adult Education, Dislocated Workers, and Wagner-Peyser and inserted into the local plans for each workforce system. Each local plan should specify how recruitment and outreach is done to reach these ‘hard to serve’ populations, how specific efforts are made to serve these populations, and connect these to the outcome targets.
3. Add language: “these measurements should be identified separately so there is an understanding of how each system serves these individuals as part of their scope of work. This is important so each

system has a clear sense of how many 'hard to serve' individuals are served (including the number served in each priority sub-population), what services they access, and measureable outcomes. These populations should be served fully and viewed as an important part of the work of each system. These measurements should then be compliant with the specific targets that are set for 'hard to serve' populations”

4. Add language: “Work based learning can be developed for 'hard to serve' populations that has more flexible timeframes and requirements in terms of where this learning occurs. This type of flexibility is important to encourage 'hard to serve' populations to explore different work opportunities so that an effective career choice is feasible.” populations.

5. Add the specific performance indicators that are established for “hard to serve” populations into the Performance Chart (in the State Plan) under “Additional Indicators” – include these for all categories, not only Wagner-Peyser. It is somewhat typical that some homeless job-seekers will access Wagner-Peyser Services, but very few qualify for additional, longer-term services and training that would lead to job placement and retention support.

6. Add language: “consistent efforts should be made by each workforce system to provide ongoing types of staff development and training experiences to improve overall ability of staff to serve “hard to serve” populations, including those who have experienced homelessness. The goal should be to develop the ability of each staff-person so that the overall capacity and cultural competency increases as does their ability to serve “hard to serve’ people. These staff development activities should include diverse trainings to understand oppression, to learn new approaches for working with individuals who have different barriers, to be sensitive to the challenges that low-income people face, and to better understand how to assess the current work potential of individuals who have experienced trauma (homeless individuals, foster care youth, veterans, individuals with offender backgrounds)”.

7. Add language: “local plans and workforce systems should identify specific outreach, intake, assessment and enrollment strategies for “hard to serve” populations to determine how they are effectively linked to appropriate services and opportunities.”

8. Add language: “each of these efforts to increase and cultivate services for 'hard to serve' populations should be described in detail in all local and regional plans”.

#### Response to Comment

**“It seems that such service categories as Vocational Rehabilitation, Dislocated Workers and Wagner-Peyser do not have measureable targets.”**

**Response: Thank you for your comment. Targets for certain measures defined in the WIOA law are intentionally not set in the plan per guidance from the Federal Departments of Labor and Education. These measures were designated by the Federal departments as being “basebuilding” for the first two years of the state plan. They applied this designation in cases where either the measure itself has not yet been fully developed or where the program the measure was being applied to had never gathered this type of information before and had no real basis to estimate a reasonable target.**

**All comments recommending the addition of targets related to hard-to-serve populations**

**Response: Thank you for your comment. Both the WIOA law and the proposed regulations address the requirement for a “regression model” to be developed at the Federal level to assist in setting targets for all of the measures. A regression model aimed at performance on these types of measures will generally include factors indicating the strength of the local economy such as the employment rate, as well as demographic factors related to the customers served. The draft WIOA regulations**

include factors that are under consideration for the model, and many of these would fit under the general definition of “hard to serve” as noted in the comments. The Federal intent in including these factors is to adjust performance based on the customers served in the program. In the case of those generally categorized as “hard to serve” the model would lower performance targets as the percentage of those served in those categories increase. This is intended to provide an incentive to serve these populations, or at the least to remove the performance disincentive for serving these groups. Since the target setting process is expected to include these incentives toward serving these groups, the state has opted not to add additional targets aimed at the same end goal. This in no way diminishes Colorado’s commitment to serving the targeted groups and increasing their access to the workforce system and its broad range of career and training services.

Comment 2: Adams County

“Doesn't Wagner-Peyser also have federally mandated performance measures of Veterans and disabled veteran EER, ERR, and Wages? Should those be included in the appendix as a performance goal for the specific Core Program?”

**Response:** Thank you for your comment. The targets for veterans served under the Wagner-Peyser program and served by state staff funded under the JSVG (Jobs for Veterans State Grant) program are set in a separate process with the VETS (Veterans’ Employment and Training Service) division of the Federal Department of Labor. VETS has not yet issued any guidance on the performance measures that they will require under WIOA. VETS has used a process outside the WIOA state plan for setting these measures and targets in the past, and the state hasn’t received any indication that they want these included in the state plan being submitted this year.