

WorkSource System Policy 1014 Revision 1 (Coordinated Business Services) – Public Comment and WSID Responses

January 11, 2013

| Name | Entity | Comments | WSID's Response |
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| Dave Petersen | North Central WDC | <ol style="list-style-type: none"> 1. Overall the Revision improves this policy except that North Central has found value creating local business service plans and will likely retain these as the foundation for implementing the revised policy. 2. The policy assigns a duty to WDCs that seems to exceed their authority to carry out. "Develop a business service strategy that eliminates duplication among partner agencies and aligns local efforts with state strategies" requires the ability to set policy for one-stop partners. WDCs have no direct policy guidance authority to set or enforce rules generally applicable to non IB partners. It may be possible thru the "certification" process to prescribe certain requirements. Even so, non-IB partners may opt out of this process. 3. The definition of oversight, "Establishing local service delivery standards/expectations", exceeds the ordinary use of the term and implies policy guidance authority. | <ol style="list-style-type: none"> 1. WSID will update the policy to clarify that the intent is to remove the requirement but not to discourage the development of Business Services Plans. Although WDCs are no longer required to maintain Business Services Plans, WDCs should determine whether or not the development of a local Business Services Plan is beneficial for their WDA. 2. That specific statement was from an earlier draft of the policy. Based on earlier feedback received, WSID updated that language to read: "WDCs are responsible for the development and oversight of a locally coordinated, focused and cost-effective business services strategy that aligns with state strategies. WDCs should identify and leverage all business service resources to contribute to the coordinated delivery of services." The intent of this section is to highlight the WDC's oversight role for the local system, including coordination among partners to better serve customers. 3. The intent here is to ensure the local system is accountable to the WDC in its oversight capacity. WDCs set standards and expectations for the system and may choose to take action to ensure these expectations are carried out. |
| James Blatz | Sea-King WDC | <ol style="list-style-type: none"> 1. The draft policy does not mention that training is required. Does that mean WDCs will no longer be required to conduct training on job orders? 2. Will MOUs need to be revised in order to incorporate the WDA's business services strategy as articulated in the Local Integrated Workforce Plan given the Business Service Plans are no longer required? 3. Should labor market information be included as a required business service rather than optional given local areas are required to use demand/decline information to assess an eligible individual's needs for training? | <ol style="list-style-type: none"> 1. Correct. WDCs will not be required to conduct training on job orders or referrals, however, job order and referral services must comply with state and federal requirements outlined in WIN 0032. 2. Not necessarily. The Business Services Policy (1014 Rev 1) only requires the local business services strategy to be included in the LIWP. However, because the MOU Policy (1013 Rev 1) does require a description of the integrated service function of employer/business services, it may be appropriate to provide additional context within the MOU to align with the LIWP. 3. The intent was to align the required business services with federal regulations. Providing labor market information is not specifically called out in federal regulations as a required business service so it is listed as optional. The use of demand/decline information to assess an eligible individual's needs for training is not considered a direct business service. |

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| Bryan Pannell | Sea-King WDC | <ol style="list-style-type: none"> 1. What will be the effective date of the new policy? How will this affect scheduled monitoring moving forward? 2. Sec. 3.a - WDC Oversight: Please define “leverage.” Will this entail a specific performance measurement or a documented funding expenditure? Will there be specific requirements identified? 3. Suggest the addition of “and business services partners” following the word “resources.” 4. Sec. 3.b - Required Business Services: Does this eliminate the previous Appendix A requirements in Policy 1014 while still allowing local flexibility to add selected additional service requirements as outlined in Section 3c? 5. Does this also constitute a requirement to document required business services activities in SKIES? 6. Regarding employment-generating activities: Currently, WDC-sponsored Business Services are geared toward WIA program participants. However, if business requirements cannot be met using that seeker pool, opportunities are opened up to those who are not WIA participants. Under this policy revision, is this an allowed practice? If not, what is the proper mechanism that can be leveraged for this policy to serve the entire WS system? 7. Sec. 3.c - Flexibility for Local Strategies: It is recommended that the policy include provisions for dispute resolution as included in the previous policy version. This provides partners a mechanism for dispute resolution and prevents expenditure of time, resources, and effort that could be channeled to more productive business services activities. | <ol style="list-style-type: none"> 1. The effective date will be the date this policy is issued to the system. At that time, this policy (including updated requirements) will supersede the existing Business Services policy. Based on the scope of the monitoring visit, these policy requirements may or may not be part of the review. One of the goals of this revision was to align state requirements with federal requirements, including the removal of any additional state requirements. 2. There won’t be a specific performance measurement or documented funding expenditure. The intent is to highlight the WDC’s oversight role for the local system, including coordinating and leveraging partners to better serve customers. 3. WSID will update the policy to include your recommendation. 4. Exactly. The goal was to clearly spell out federally required business services while encouraging local areas to identify other beneficial services to provide. 5. No, the required business services don’t need to be recorded in SKIES. Local observations and review of the local business services strategy may be used to verify that the required services are provided. 6. To clarify, the statement regarding employment-generating activities should not be confused with other allowable business services. Use of WIA 1-B funds for employment-generating activities is not allowed unless directly related to training for eligible individuals. This stipulation doesn’t apply to other allowable business services (i.e. opening opportunities up to non-WIA participants). A coordinated and cost-effective business services strategy that <i>leverages WIA and Wagner-Peyser</i> funds enhances opportunities to meet the business needs of employers. This strategy not only enhances job prospects for WIA participants, but also for job seekers who are not WIA participants. 7. The dispute resolution process was originally included as part of the requirement to collaborate with local partners to develop a business services plan. Because the plan is no longer required, the referral to the use of a dispute resolution process doesn’t flow with the intent of the policy to provide a more concise look at federal requirements. This being said, the MOU policy (1013 Rev 1) describes the dispute resolution process and WDCs are encouraged to use this process when convening partners for any strategic planning process. |
| Dawn Karber | Spokane WDC | <ol style="list-style-type: none"> 1. Nice job on this policy; it is clear and concise and nicely outlines roles and responsibilities. It does appear to imply that WDCs are responsible for coordinating Labor Exchange services. Clarification is needed. | <ol style="list-style-type: none"> 1. The delivery of Labor Exchange services is a federal requirement and the WDC must describe how these services are provided as part of the local Business Services Strategy. In addition, part of the WDC’s oversight role for the local system is coordinating and leveraging all local one-stop system resources, including Labor Exchange. In short, the WDC is responsible for ensuring coordination with Labor Exchange to ensure that the local Business Services Strategy is achieved. |