

## Responses to Public Comments

Comments are ordered and divided by sections from the plan

Commenter	Page # and Section	Further explanation or comments	Response to comment
<b>General Local Plan Comments</b>			
Vickie Burns – LCSA		Well done! I am completely on board with the vision statement, especially the foresight for workers to have the skills <u>AND</u> support they need to be successful in the labor market. With more challenging populations to serve under WIOA, the support piece is crucial to the success of these folks as identified by the barriers in the narrative	No response needed.
Sarah Heiner – ESCO		I think the plan is well thought out and put together. I am looking forward to supporting its implementation.	No response needed.
Carol Lamon - DHS		<p>Below please find comments on the Draft WIOA Local Plan 2016-2020 submitted by Worksystems Inc. The bulk of the comments pertain to suggestions for improvement for areas that seem unclear, or do not fully describe how services will be planned, provided or measured, especially for underserved populations. Since there are responses to multiple sections in the plan, some of the comments may be redundant insofar as they outline similar concerns in those areas.</p> <p>While there has been some improvement and attention given to underserved populations in this region, the overall design and approach can use significant strengthening. The new WIOA legislation gives WSI the opportunity to more fully serve low-income individuals, youth, limited English speakers, people of color, people with disabilities, the long-term unemployed, and those with other barriers to employment. However, in the description of serving these populations, much of the plan outlines some existing structures and aspirational goals for improvement, but it does not outline a concrete plan for how it will get there, nor provide an outline of how WSI will develop, in conjunction with stakeholders, the more detailed strategies needed to achieve those goals. The comments below outline where WSI might more fully explore options in those areas within the context of the state plan.</p> <p>The purpose of the document is to outline how WSI will engage in services and planning following the federal and state plan requirements. Given that the plan is one to cover a four-year timeframe, the comments fell into the three general categories:</p> <ol style="list-style-type: none"> <li>1. As mentioned above, there are many broad goals, but the plan is short on specifics for how goals will be realized. Create more actionable next steps, even if that is just convening partners to develop the specific strategies.</li> </ol>	<p>We're supportive of the increased focus on underserved populations in WIOA and believe that we're well positioned to continue in this direction.</p> <p>In addition to an increased focus on underserved populations, WIOA and the State Plan call for increased alignment and participation of Core programs like DHS self-sufficiency within the public workforce system.</p> <p>Given that the inclusion of Core partners beyond OED and WIOA Title 1-B in the public workforce system is just commencing under this Local Plan, and that integrated governance and management between Core partners to support this joint effort isn't yet in place, we have not developed detailed strategies for how we'll jointly deliver services to these underserved populations.</p> <p>Rather, we have focused on establishing an integrated management and planning structure (Local Leadership Team) where all participating agencies and programs come together to jointly develop and implement these concrete and detailed strategies. This plan sets the</p>

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		<ol style="list-style-type: none"> <li>2. More connection should be made in the document to the changes in the WIOA legislation, and what that means for the local workforce system in terms of defining goals, data collection and analysis to meet those goals.</li> <li>3. More description is needed about how stakeholders will be engaged in setting priorities and planning.</li> </ol> <p>One last observation before responding to individual sections of the plan would be that many of the issues raised might be better addressed if a similar methodical approach was taken for evaluating effectiveness for the job seeker as is being used for evaluating the needs of employers. From the employer perspective, the five phases described to Investigate, Inventory and Analyze, Convene, Act, and Evaluate outlines a solid approach to continuous improvement. Having the same level of inquiry, analysis and feedback from the <i>job-seeker</i> perspective, including those with barriers to employment (and from organizations serving these populations) would help provide valuable information to WSI in the design and delivery of services.</p> <p>Thank you for the opportunity to provide input to a plan that seeks to improve the local workforce system during the next four years. It is critical that the services offered be able to be responsive and flexible to meet the changing needs within both the employer and job seeker populations.</p>	<p>framework for the detailed discussions that must be undertaken by all core partners.</p> <p>One of the first deliverables associated with this Plan will be the development of a Memorandum of Understanding (MOU) with each core partner that will include a detailed description of services to be provided through the system, including how those services will be accessed and delivered, how costs will be shared, and how services will be evaluated and continually improved.</p> <p>Stakeholders will be engaged in setting priorities and planning by participating in joint management at the regional and Center levels.</p>
Ken Dodge – WSPM Beaverton/Hillsboro		<p>Portland Community College (PCC) looks forward to being actively involved in discussions and planning for a statewide and local one stop delivery system, and hopes to be full partners in the collaboration for the success of WIOA in our local area. The following is some specific feedback for the local WIOA Plan.</p> <ol style="list-style-type: none"> <li>1. Overall, PCC would like to underscore the essential role and value of education and training in helping Oregonians secure opportunities in high demand, high wage employment. This is especially relevant in breaking the cycle of poverty for marginalized populations. We feel it is important to more strongly state this data driven fact in the plan.</li> <li>2. As an integral partner, community college programs and services must be a key and intentional element for plan components to be most successful, and should be articulated very clearly in the plan. For example: <ul style="list-style-type: none"> <li>• Career and Technical Education programs have advisory committees comprised of industry representatives that help shape curriculum.</li> <li>• PCC and other colleges engage with employers to create new programs that support the changing workforce. This includes responding to pipeline needs as well as incumbent worker resources and training.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. We agree that education and training is essential to breaking the cycle of poverty and this fact underlies our work. No change was made to the plan.</li> <li>2. We agree that Portland Community College’s programs are critical and are identified as a key element in the Local Plan. The programs and services you mention are essential to our success in serving employers, adults and youth in our area. To that point, there are an array of unique programs and services provided by multiple partners that allow us to carry out the strategic vision and goals outlined in the Local Plan. The intent of the Plan is to articulate the array of partners involved, not necessarily to enumerate each partners’ programs and services. Adding</li> </ol>

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		<ul style="list-style-type: none"> <li>• PCC programs have internship/co-op experience opportunities for students to hone their practical skills and for employers to “try-out” potential employees.</li> <li>• PCC’s Foundation works closely with employers to identify fundraising opportunities for student scholarships and other types of donations of resources, goods and services.</li> <li>• Employers regularly hire graduates of programs at PCC. The businesses post position with PCC and participate in periodic job fairs.</li> </ul> <p>3. Career Pathways initiatives offer students short-term, stackable certificates that prepare them for employment in high-growth, high-demand industry sectors while also providing a stepping stone to an associate degree, bachelor’s degree, and beyond. Professional and Business Services is one of the fastest growing employment sectors, and a successful pathway into living wage employment. PCC has shown demonstrated success with this Career Pathways approach. The plan could benefit from expanding targeted industry sectors into this and other areas.</p> <p>4. Strengths of the Draft Plan from the Title II Perspective:</p> <ul style="list-style-type: none"> <li>i. The plan recognizes that there are many individuals in the region who experience barriers to employment due to a lack of education and/or low level academic and language skills</li> <li>ii. Supports the goal of serving regional workers, particularly those with low basic skills, so that they have the skills needed to fill current and emerging quality jobs</li> <li>iii. Supports the vision that low-skilled adults have access to Title II-supported skill building activities that prepare them for advanced education and training opportunities leading to industry credentials and/or employment</li> <li>iv. Recognizes that there is a need to build stronger ties between Core WIOA programs (Title II in particular) and WSPM to address the needs of individuals with low basic academic and language skills</li> <li>v. Recognizes that Portland Community College and Mt Hood Community College are already integrally connected to the public workforce system and can be strong partners under WIOA</li> </ul> <p>5. Areas of the plan that could be strengthened:</p> <ul style="list-style-type: none"> <li>i. The Plan could provide additional detail on how the board plans to partner with key Adult Education and Literacy providers in a collaborative and strategic manner that best leverages expertise and resources from all partners</li> <li>ii. Outline specific strategies on HOW to connect clients with low basic skills to high-quality services and programs (we recommend that these strategies be jointly developed by Worksystems and local Title II providers)</li> <li>iii. Align more directly with the Title II sections of the State Plan</li> <li>iv. Highlight existing and proven effective basic skills services already available in the region through the community colleges, including education activities for</li> </ul>	<p>these bulleted points would require that we list the same for every partner outlining their essential services. We think the MOU process is the forum to highlight services that each partner brings to the table.</p> <p>3. The Workforce Development Board was integral in pioneering Career Pathways, supports its development and believes strongly in this approach.</p> <p>The target sectors we are focused on directly align with the efforts of our Economic Development partners which is a key requirement of WIOA. Further, business and professional service opportunities exist within each of the targeted sectors.</p> <p>4. No response needed.</p> <p>5. We agree that more details are needed and those will be determined during plan implementation. Implementation will include MOUs with partner agencies. (See page 2)</p> <p>6. An equity lens was applied in developing this plan and related policy decisions. We are committed to continuing to build the partnerships, engagement, transparency and accountability to assure equity at all levels of the system.</p> <p>More concretely, we have made equity and inclusion an actionable priority in this Plan through the identification of key populations served, system partners, program services, and initiatives to impact our community and workforce.</p>

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		<p>reading, writing, math, GED preparation, and English language skills development in conjunction with vocational training</p> <ul style="list-style-type: none"> <li>v. Include a stronger in-depth economic and workforce analysis through an equity and inclusion lens</li> <li>vi. Elaborate on how the system will support low-income and underrepresented individuals' access to streamlined services that result in skill development, high quality trainings that lead to credentials and realistic opportunities to start on a career path that provides opportunity for advancement.</li> </ul> <p>6. It is important the plan use an equity and inclusion lens when approaching workforce analysis and interventions. PCC would like to see this value more strongly reflected in all elements of the plan, from workforce analysis to strategies for impact.</p> <p>NOTE: Portland Community College's Interim President, <b>Sylvia Kelley</b>, is listed in the Board Membership document attachment as Sylvia Hayes (4 spots). This oversight should be corrected.</p>	<p>Over the past Strategic Plan period we have broadened the focus and composition of the public workforce system to include a broad array of new initiatives, partners, and programs that are centered on a mission of equity and inclusion. We see these as concrete resources and key partners to support equity and inclusion in this Plan. Some of these partners and programs include Metropolitan Alliance for Workforce Equity (MAWE), Construction Apprenticeship Workforce Solutions (CAWS), Economic Opportunity Program, Health Careers NW, Housing Works, Linking Employment Activities Pre-release (LEAP), BankWork\$, Constructing Hope, International Refugee Community Organization (IRCO), Central City Concern, Dress for Success, Oregon Tradeswomen, Human Solutions, Self Enhancement, Inc., Cascade AIDS Project, Community Action, and Human Solutions.</p> <p>Sylvia Kelly's name has been corrected in the plan.</p>
Kelley Keith – MHCC		<p>Mt. Hood Community College (MHCC) is excited by the opportunity to serve as active and collaborative partners under our state and local plans to serve those who have the greatest barriers to education, training, and employment under WIOA. Furthermore, we look forward to deepening our partnership, and serving a broader population of clients and students under this local plan. The following are our comments relating to a broad perspective and specific sections in the local plan.</p> <p><b>Broad Perspective</b></p> <ul style="list-style-type: none"> <li>1. Throughout the local plan, there are many occasions where Worksystems is identified as being committed to this legislation. And from years of partnership, we are inspired by your commitment to underserved populations. It is important to note that the local plan involves multiple partners who are currently and will continue to be committed to serving this population. By using language such as,</li> </ul>	<p>We agree with your perspective, but the plan instructions were very focused on the role of the Workforce Development Board and the broad array of partners it represents. That said, we will modify language in the Plan summary to ensure it reflects the inclusion of all partners.</p>

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		<p><i>regional partners or local partners in contexts such as, commitments to ensuring underserved populations have opportunity or other contexts, all partners identified in this document will feel inspired, included, and engaged. It is important that the local plan embody the spirit of collaboration and inclusivity.</i></p>	
<b>Section 1: Workforce &amp; Economic Analysis (pg. 7-22)</b>			
Sarah Heiner – ESCO	Pg. 17 1.3	<p>Veterans: Veterans also face barriers to employment. Studies cite the lack of preparation for finding a civilian job; unrealistic expectations surrounding the kind of work and salary for which they <b>quality</b>; unaddressed mental health issues; and difficulties adapting to civilian work culture as reasons. There are about 43,000 veterans in Portland Metro, 32,000 of whom are in the labor force. Of these, 3,400 are unemployed for an unemployment rate of 10.7 percent.</p>	Highlighted typo was corrected.
Carol Lamon – DHS	Pg. 18 1.4	<p><b>1.4 – Analysis and description of adult and dislocated worker activities, including an analysis of strengths and weaknesses</b></p> <p><b>Strengths Section</b></p> <p>In the <u>Partnership is the Key</u> area, I would say that the second bullet - that there is a “very strong level of systems alignment between community-based and local public agency partners focused on vulnerable populations...” - overstates what exists. The alignment and partnership is more at a foundational level right now. A systemic approach to service planning has not been in place, though there are efforts to build the framework for a broader level of involvement. The WSI board of course provides overall direction, but more detailed planning for alignment and services comes through more engagement with community partners. The strategic vision session this summer provided a place for broader community input on the goals for the system going forward, and recently a state-led meeting helped to outline a plan for creation of local leadership teams. Perhaps what can be described here is how these committees will help identify specific strategies and a framework for improving services in alignment with state and local goals.</p> <p><b>1.4 - Weaknesses Section</b></p> <p>There would seem to be more areas of need than what is described here when considering the new WIOA and State expectations for serving targeted populations. Examples include the need to develop strategies by employment sector for targeted populations, the need of improved data and reporting, a more robust outreach plan to connect targeted populations to the services offered, and the need to more fully evaluate customer</p>	<p>Strengths response -</p> <p>We agree that the alignment and partnership with DHS self-sufficiency programs is at a foundational level right now and that a systemic approach is not currently in place. Our description of “very strong level of systems alignment between community-based and local public agency partners focused on vulnerable populations” is citing the areas where strong partnership and progress has been made with public agency and community-based partners, including the Oregon Employment Department, Public Housing Authorities in both counties, County Corrections in both counties, Portland Housing Bureau, Portland Development Commission, community colleges, neighboring Workforce Boards, and large array of community-based partners and programs. These existing relationships represent the effectiveness of working together to serve common customers – especially those facing significant barriers.</p> <p>Weaknesses response -</p>

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		<p>feedback, outcomes and current service design to best meet the needs of the populations served.</p> <p>Also in this section, and in other parts of the plan, it mentions lack of state level policy or direction to support partnership. This seems to minimize or understate the local role, including how stakeholders will be involved in priority setting, design, and improvement strategies. While State support is critical in providing data and structures to ensure that LWIBs statewide are pulling towards common vision and goals, local relationships are what makes designing and implementing improved service strategies possible. As the local convener for workforce planning, WSI plays a critical role how this will happen. A suggestion would be to put more detail about local planning in the document. In the sentence “Worksystems will continue to engage locally to align additional partners with WorkSource Portland Metro...” it would be helpful to outline how. For example, a brief description that outlined the what, who and by when.</p> <p>Related to this, in the <u>Next Steps</u> section I would suggest giving more detail on the bullet that says “Build stronger ties between Core WIOA programs....to address the needs of target populations...” This is a good goal, but doesn’t give anything concrete for a next step.</p> <p>Also this section could benefit overall from a mention of the WIOA legislation changes that create more service and outcomes expectations for target populations.</p>	<p>More details will be developed during plan implementation. The framework of WIOA starts at the federal level, goes to the state and then to the local areas. We believe there needs to be leadership and clarity at the state level to be effective locally. This belief is not intended to understate the importance of the local role in implementation. There has been a long standing expectation for increased alignment of workforce programs and efforts. Without commitment and clarity at the State agency level, however, this expectation has largely gone unfulfilled. Experience tells us that local change in State run systems requires clear, consistent communication from the top. Additional details will be articulated through the MOU process.</p>
Jarrod Hogue - MHCC	Pg. 8-10 1.1	In-Demand Sectors section: Using average annual wages is deceptive (example: Adv. Mfg. average wage = \$93,700). The analysis should include mean and median and disaggregate wages by job classification, experience and educational requirements.	<p>We agree that median wages can add valuable information. The upcoming Advanced Manufacturing Sector report has industry-level information on median wages and employment by hourly wage ranges. Median wages by occupation are also covered in the Sector reports, as is employment by educational requirements (current and forecasted).</p> <p>The other three Sector reports also contain this information.</p>
	Pg. 11 1.2	Healthcare sector analysis talks about increasing demand for Community Health Workers. Employers have nor/will not invest CHWs until healthcare system transforms to a fee-for-performance system. More analysis is needed.	We are not sure what this additional analysis would look like, but are happy to be part of the conversation
	Pg. 16 1.3	Description of NCRC incomplete and no mention of WorkKeys assessment link to occupational profiles.	We disagree that the description of the NCRC is incomplete. Further, the reference to NCRC in

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			this section pertains to a measure of skills in the workforce. While WorkKeys is the assessment that is used by the NCRC, the resulting skill level determination is an NCRC construct.
	Pg. 20 1.4	<p>Strengths - No mention of community colleges programs contribution to the workforce system, including hundreds of graduates who enter the workforce in healthcare, manufacturing and IT every year.</p> <p>Weaknesses – Leveraging of educational infrastructure and expertise of community colleges to maximize outcomes and employer engagement—so much potential here with strong relationships.</p>	<p>Clarifying language was added to the plan.</p> <p>We agree with the weakness note, but believe all partners need to better align approaches to engage and maximize outcomes with employers. This will be addressed during implementation.</p>
Kelley Keith – MHCC	Pg. 21 1.5	<p>There is no mention of Title II and services that are currently in place at Mt. Hood Community College or other colleges that address this need.</p> <p><i>In Multnomah and Washington Counties, there are 15,600 youth aged 16-24 years who are not in school and do not have a HS diploma/GED. Of these, 98% are very low-income or living in low-income families defined as 70% of the US Department of Labor’s Lower Living Standard Income Level which is at or under \$11,000 for an individual or \$26,500 for a family of four. Without re-engaging in education, the lifelong employment prospects for these youth are bleak. In addition, opportunities to explore careers and get basic work experience are far more limited for today’s youth than in the past.</i></p>	Clarifying language was added to the plan.
Clay Cooper – Central City Concern	Pg. 15 1.3	<p>The 2015 Point-in-Time Count of Homelessness in Multnomah County identified 1,887 people who were unsheltered on the night of January 28, 2015 - nearly the same as 2013's count of 1,895 unsheltered individuals. More broadly, 3,801 people met the Department of Housing and Urban Development's definition of homelessness, which includes those in emergency shelters and transitional housing.</p> <p>The economic recovery should be helping more people exit homelessness, but such is not the case. According to the 2015 Point-in-Time count, "Multnomah County's continuing struggles with homelessness can be attributed to the combined economic challenges of high housing costs, low vacancy rates, stagnant wages, and high levels of unemployment among some of our community's most vulnerable populations." In particular, African Americans and unsheltered families experienced significant increases in homelessness: 48% and 24% respectively. For these groups in particular, economic conditions are often the primary driver of homelessness, as opposed to disability, mental illness, or addiction.</p>	We understand and acknowledge a broad array of barriers that exist for job seekers. Instead of focusing on barriers, the plan is framed to focus on target populations and homeless persons are included in the target populations (see section 3.9 of the plan).

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		<p>Individuals who are “homeless” likely suffer from the barriers listed on pages 16 &amp; 17 (e.g. Education, Disability, Criminal History, Childcare, Long-term Unemployment) but these barriers don’t completely represent the challenges of being homeless, which include:</p> <ol style="list-style-type: none"> <li>1. Negative stereotypes by employers that doubt their ability, motivation and reliability. Employers also have concerns about integrating homeless individuals into the workplace.</li> <li>2. Individuals suffering from homelessness have often experienced trauma before or while they were homeless, which can require intense trauma-informed care.</li> </ol> <p>Due to the fact that people who are experiencing homelessness have additional and overlapping barriers to employment, we believe “<b>homelessness</b>” should be included as a barrier to employment within the WIOA Local plan.</p>	
<b>Section 2: Strategic Vision &amp; Goals (pg. 23-26)</b>			
Vickie Burns – LCSA	Pg. 24 2.1	<p>Toward that end, I believe <u>Section 2.1.3, GOALS</u> is missing a few words:</p> <p>"Regional workers, particularly low income and other underserved residents including those receiving public assistance, those with low basic skills, and communities of color, have the skills <u>AND SUPPORTS</u> they need to fill <u>AND RETAIN</u> emerging quality jobs.</p>	Error has been corrected.
Sarah Heiner – ESCO	Pg. 26 2.3	<b>OWIB Goa 4</b> : Create and develop talent by providing young people with information and experiences that engage their interests, spur further career development, and connect to Oregon employers.	Highlighted typo was corrected.
Carol Lamon – DHS	Pg. 23 2.1	The response here cites the community forums that gathered input to create the Mission, Vision, Guiding Principles and Goals for the system. There were great ideas generated from these sessions. However, no plan, nor a description of how to create a plan, is included here. This section would benefit from a plan for how these goals can be translated into action-oriented strategies	The question asks for the Workforce Development Board’s Vision and Goals. Detailed actions will be developed during plan implementation.
	Pg. 25 2.3	<p>Goal 1 – For the Worksystems section, it mentions it ‘continuously improves to deliver outcomes for employers and job seekers’, but it doesn’t list how it would continuously improve. As noted above, a suggestion would be to employ a similar continuous improvement process as is being used with the employer side of the workforce system. Or, if there is another method to doing this, then describing that in this section would be helpful.</p> <p>Goal 3 - Job Seeker Training and Skill Building It is heartening to see that there is an intention for flexibility by rethinking and restructuring current training and skill development offerings, which may not be meeting the needs of the job seeker.</p>	<p>The plan outlines high level goals. Details will be developed during plan implementation.</p> <p>No comment.</p>
	Pg. 26 2.4	This section only lists the historical reporting, but should also mention the new expectation for performance reporting by population under the new WIOA legislation, and how the local system is preparing for this change.	We do not yet know the new performance reporting requirements, but will comply once they’re available. In addition, the State is taking the lead in tracking and reporting via the State

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			run PRISM system. Additionally, as part of the LWDB role to oversee the system, each core program will be asked to submit performance and service data to the LWDB on a regular basis.
Jarrod Hogue - MHCC	Pg. 25 2.3	Goal 2 - Workforce development is more than labor-market supply. Incumbent worker or customized training (OWIB Goal) linked to advancement and competitiveness is a proven model and a strategic use of public/private dollars, fostering an environment co-investment, employer buy-in and creating entry-level or mid-level opportunities for emerging or dislocated workers.	We agree. No change was made to the plan.
<b>Section 3: Local Area Partnerships &amp; Investment Strategies (pg. 27-40)</b>			
Jarrod Hogue – MHCC	Pg. 34 3.7	Worksystems did not provide seed funding for this project. MHCC ran a coding pilot at Maywood Park and some participants received funding through WorkSource. WSI required a minimum of 30 students so an agreement was not reached.	Clarifying language was added to the plan.
Carol Lamon – DHS	Pg. 27 3.1	It is good to see the list of existing partners and the goal to ‘refine the regional leadership structure to systemically engage Core program partners’. But given that this is a four-year plan, this section would benefit from more detail around how larger strategic goals for serving targeted populations would be achieved through local partnership structures. Listing current strategies such as the HCNW grant and ABAWD planning is helpful. Since this plan covers 2016-2020, are there other, longer-term goals for serving targeted populations that could be listed here?	Delivery of DHS self-sufficiency programs through the public workforce system is a high level goal included in the Strategic Plan. The HCNW grant and ABAWD programs are emergent opportunities that fit into this goal, on which we’re working closely with DHS. We expect that other, longer-term goals will be developed in partnership with DHS as a partner in WorkSource and participant in local leadership and planning efforts.
	Pg. 29 3.3	While there is mention of the state-led effort to increase alignment, this would be a good section to describe how WSI will help facilitate local planning around this. It does describe planning associated with specific grants and funders, but doesn’t describe the local planning to achieve OWIB and WIOA-related goals.	The framework of WIOA starts at the federal level, goes to the state and then to the local areas. We believe there needs to be leadership and clarity at the state level to be effective locally. This belief is not intended to understate the importance of the local role in implementation.
	Pg. 35 3.9 – 3.11	There are many effective programs in the city that WSI has connected to in order to better serve its population. For overall planning purposes, perhaps data can be shared about who is accessing services so that a responsive outreach plan can be developed. There are many crossover opportunities that haven’t been fully explored, such as an improved connection of DHS customers to CAWs and Advanced Manufacturing programs. What are the goals by population for these sector-related trainings, and what outreach strategies can get us there?	Demographics on who the system is serving is included in the plan. Performance outcomes of programs and services is evaluated and priority is given to target populations.

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	Pg. 38	No suggestions here – as mentioned in the beginning of these comments, the approach taken seems to be a thoughtful investment for continuous improvement for employer and workforce development strategies; it would be an improvement to have a similar approach for the job seeker side of the system.	No response needed
Kelley Keith – MHCC	Pg. 29 3.2	MHCC agrees that One-stop (WorkSource) needs to have access to core programs and activities and that there be some core program activities offered through the One-stop center as appropriate. It is also important that WorkSource provide access to services with other core partners for the system to be effective and impact the cycle of poverty—which is already in place at MHCC.	We agree that access to services of core partners is critical for the system to be effective. The place of intersection between these programs envisioned in WIOA, the State Plan, and our Local Plan is the “one-stop” system, known locally as WorkSource Portland Metro. In WIOA, core programs are intended to be organized into a common “one-stop” system around the customer, rather than organized as separate programs that the customer must navigate.
	Pg. 29 3.3	In the spirit of inclusion and collaboration, the Unity meetings should include Title II representation.	Sorry - we’re not familiar with the “Unity meetings” and see no reference to them in the Local Plan.
	Pg. 31 3.5	<p>1. MHCC is looking forward to further collaboration and a deepening partnership of WorkSource and Adult Education and Literacy. The collaboration and integration of our programs has made an incredible impact on our shared students/clients and on our outcomes. We hope to continue developing and expanding this work to serve more of the community. While, we offer some Title II services at WorkSource, it’s important to note that space at WorkSource isn’t adequate for providing face to face coursework. Furthermore, in review of the state plan (Pages 95-105), there are additional criteria for Adult Education/Title II in the RFA process that needs to be identified in the local plan in order to be in alignment with the state plan.</p> <p><i>The local board is required to determine whether local applications to provide adult education and literacy programs under Title II are consistent with the local plan and make recommendations to the Title II agency to promote alignment with the plan. Our vision for alignment of Title II activities within the one-stop delivery system is that low-skilled adults have access to Title II-supported skill-building activities (reading, math, English language) at WorkSource Centers that prepare them for advanced education and training opportunities leading to industry credentials and/or directly to employment.</i></p>	<p>We value MHCC’s partnership and participation in WorkSource Portland Metro and welcome the provision of Title II services at WorkSource locations. To your concern about limited space:</p> <ul style="list-style-type: none"> <li>a) We emphasize a “common customer” approach where services provided by a variety of Core partners such as Adult Basic Education, occupational training and job placement are brought together seamlessly around the customer. We do not see this as necessitating the delivery of all services inside WorkSource Center locations.</li> <li>b) We value “one-stop” efficiency and ease of access for customers and are exploring locations that can support</li> </ul>

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		<p><i>Worksystems will work with CCWD and local providers of Title II adult education to promote alignment through adoption of the following strategies: concurrent enrollment, prioritization of WorkSource customers in Title-II funded programs, delivery of applicable career services at one-stop centers including outreach, intake, and assessment for Title II programs, delivery of some Title II services at WorkSource Centers, co-development and co-funding of innovative service delivery strategies that might include industry- and/or workplace-contextualized basic literacy and ESL offerings, accelerated basic skill offerings, and concurrent basic skill/occupational skill training. Worksystems will review local applications for inclusion of these strategies.</i></p>	<p>the expanded partnerships and services within one-stops that are mandated by WIOA.</p> <p>We believe the plan is fully aligned with the Title II sections of the State plan. The RFA is a competitive process being managed by CCWD.</p>
	Pg. 35 3.9	<p>In the spirit of inclusion and collaboration, it would make sense for all core partners to provide their data and demographic information into this section of the plan. Currently, this section has numbers served through WorkSource Portland Metro and the youth system.</p>	<p>No change was made to the plan. The question pertains to target populations that will be served. Demographic information was included as additional information to demonstrate how WorkSource Portland Metro and the youth system are currently serving these populations.</p>
<b>Section 4: Program Design &amp; Evaluation (pg. 41-49)</b>			
Jarrod Hogue - MHCC	Pg. 49 4.7	<p>Prerequisite services should be analyzed for potential streamlining, including pre-qualification</p>	<p>Our process reflects a responsibility and commitment to ensure informed customer choice in selecting from a curated list of options for occupational training. This list includes many training programs and providers. We're not sure what's meant by "pre-qualification" but are open to discussion. We don't anticipate eliminating process steps intended to support informed customer choice for some training programs and providers and not others.</p>
Carol Lamon - DHS	Pg. 43 4.1	<p>This section describes the current state, with the strategies listed to pursue funding for specific training and employment services which can offer new opportunities for targeted populations. In addition to that, it would be helpful to take stock of the current design, and assess its effectiveness with targeted populations. It is important to get feedback both from users who have successfully completed services as well as from those who have not successfully completed services, or stopped using the services altogether.</p>	<p>We agree and constantly assess the effectiveness of program services with targeted populations through numerous performance measures and data analysis. Each of the many programs, contracts, competitive grants that are part of the system carry their own distinct performance measures. We also regularly survey customer satisfaction and experience of the users of system services for the purposes of continuous improvement.</p>

Commenter	Page # and Section	Further explanation or comments	Response to comment
	Pg. 45 4.5	Perhaps an oversight - there doesn't seem to be any description of a continuous improvement strategy here.	Clarifying language was added to the plan.
<b>Section 5: Compliance (pg. 50-57)</b>			
Carol Lamon – DHS	Pg. 55 5.9	For the Center Review process, it would be helpful to describe for the reader how that information has been used to improve performance and customer experience.	Clarifying language was added to the plan.