Combined State Plan for Nebraska's Workforce System July 1, 2016 – June 30, 2020

2-year modification Draft released – January 26, 2018

Summary of Public Comments and Responses

The Nebraska Departments of Education, Health and Human Services, and Labor and the Nebraska Commission for the Blind and Visually Impaired:

- released the modification Combined State Plan for Nebraska's Workforce System in compliance with the Workforce Innovation and Opportunity Act; and
- sought public comment on this modification during a 30-day period beginning January 26, 2018 and ending February 25, 2018.

In addition, a public hearing was held on February 7, 2018 from 2p to 3p. The hearing was available simultaneously at the following ten (10) Nebraska Vocational Rehabilitation locations across the state through interactive video conferencing technology:

- Columbus 3100 23rd Street, Suite 5
- Fremont 827 North D Street
- Grand Island 203 East Stolley Park Road, Suite B
- Kearney 315 West 60th Street, Suite 400
- Lincoln 3901 North 27th Street, Suite 6
- Norfolk 1212 Benjamin Avenue
- North Platte 200 South Silber, Building 2
- Omaha 1313 Farnam on the Mall
- Omaha 12011 Q Street
- Scottsbluff 505A Broadway, Suite 500

Questions regarding this summary may be sent to ndol.wioa policy@nebraska.gov.

This summary may be accessed on the Nebraska Department of Labor *Manuals, Plans, and Reports* webpage, which is accessible at dol.nebraska.gov and can be located by:

- clicking on the Resources tab on the Nebraska Department of Labor homepage,
- then clicking on the orange WIOA button, and
- then clicking on the *Manuals*, *Plans*, and *Reports* tab.

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Public comments received in writing

1. Comment: One commenter recommended revision of Section III.b.4 (assessment and evaluation of core programs and one-stop partner programs) to align it more closely with 20 CFR § 682.220 regarding coordination with (1) local boards and agencies responsible for the administration of WIOA Title I through IV programs; and (2) the Secretaries of Education and Labor in relation to evaluations of WIOA Titles I through IV provided for by their respective agencies as described in 20 CFR § 682.220(b)(4).

Partner response: The plan partners agree with the commenter's recommendation and will make related revisions to the draft modification prior to submission.

 Comment: One commenter recommended revision of Section VI.2.3 to align it with the State's current policy on Eligible Training Providers with regard to procedures, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs.

Partner response: The WIOA Title I plan partner agrees with the commenter's recommendation and will make related revisions to the draft modification prior to submission.

3. Comment: One commenter recommended revisions of Section VI.3.1 to align it with the State's current policy on the WIOA Title I Youth Program regarding state-developed criteria to be used by local boards in awarding grants for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program.

Partner response: The WIOA Title I plan partner agrees with the commenter's recommendation and will make related revisions to the draft modification prior to submission.

4. Comment: One commenter recommended removing the reference to the Rapid Response policy in Table A of Section VI.1.2.A. Rapid Response activities are performed according to an established Rapid Response procedures manual, rather than the State's policy which is outdated as it is based on the NPRM.

Partner response: The WIOA Title I plan partner agrees with the commenter's recommendation and will make the related revision to the draft modification prior to submission.

5. Comment: One commenter requested the RESEA Distance Waiver be removed from the Title IB Waiver Requests section, noting that the waiver request will be submitted in a different manner.

Partner response: The WIOA Title I plan partner agrees with the commenter's request and will make the related revision to the draft modification prior to submission.

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6. Comment: Regarding the Wagner-Peyser stand-alone office waiver request in the Title IB Waiver Requests section, one commenter suggested providing information regarding possible office locations.

Partner response: The WIOA Title III plan partner is taking the commenter's suggestion into consideration and may make related revisions to the draft modification prior to submission

Public comments received during the public hearing

7. Comment: One commenter asked if the state's modification, once approved by Federal reviewers, will affect the regional and local plans of local workforce development boards.

Partner response: Guidance and instructions regarding the required 2-year modification of regional and local plans will be issued to local workforce development boards.

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