Regional Map Proposals:

• Region Map 4B would provide fairly even split of administrative staff budget with Regions 1&2 sharing administrative regional budget. With 1&2 combined population and membership demographics are comparative

REGION	Administrative Budget	Population	Average Membership	Combined
Region 1	\$159,129	576,918	1,469	
Region 2	\$183,872	819,349	1,679	\$315,148
Region 3	\$359,203	830,032	2,179	\$359,201
Region 4	\$316, 212	1,116,226	3,180	\$316,212

Regional Workforce Budgets - 4 Regions		Estimated Cost	Region 1&2	Region 3	Region 4
Local Board Operations		\$15,000			
Independent Local Board Support Staff		\$60,000			
	6% of Total				
Local Fiscal Agent - Average	Budget	\$19,811			
Service Provider: Title I Youth		\$50,000			
Service Provider: Title I Adult & Dislocated Worker		\$50,000			
One-Stop Operator (Range \$80,000-\$100,000)		\$100,000			
		\$294,811	\$315,148	\$359,201	\$316,212
=/-Total Budget Estate vs. Formula Administrativ	\$20,337	\$64,390	\$21,401		

• Region Map 5A provides fairly even split of administrative staff budget with 4&5; and 1&2 combining. Region 3 would have lower population and membership size by about 35%.

REGION	Administrative	Population	Average	Combined
	Budget		Membership	
Region 1	\$143,038	819,349	1,986	
Region 2	\$172,110	374,655	1,021	\$315,148
Region 3	\$359,203	830,032	1,387	\$359,203
Region 4	\$117,044	404,277	1,129	
Region 5	\$227,020	618,039	2,192	\$344,064

Regional Workforce Budgets - 5A Regions		Estimated Cost	Region 1&2	Region 3	Region 3&4
Local Board Operations		\$15,000			
Independent Local Board Support Staff		\$60,000			
	6% of Total				
Local Fiscal Agent - Average	Budget	\$20,368			
Service Provider: Title I Youth		\$50,000			
Service Provider: Title I Adult & Dislocated Worker		\$50,000			
One-Stop Operator (Range \$80,000-\$100,000)		\$100,000			
		\$295,368	315,148	359,203	344,064
=/-Total Budget Estate vs. Formula Administrativ	\$19,780	\$63,835	\$48,696		

• Region Map 5B offers the best single region map, however, the administrative regional budgets are smaller than 4B and 5A options. The question would be if administrative staff for each region could be supported by smaller regional administrative budgets.

REGION	Administrative	Population	Average	Combined
	Budget		Membership	
Region 1	\$183,872	523,167	1,679	
Region 2	\$247,451	722,313	1,739	
Region 3	\$189,961	245,557	954	
Region 4	\$238,002	978,388	2,666	
Region 5	\$159,130	576,918	1,469	

Regional Workforce Budgets - 5B Regions		Estimated Cost	Region 1	Region 2	Region 3	Region 4	Region 5
Local Board Operations		\$10,000					
Independent Local Board Support Staff		\$30,000					
	6% of Total						
Local Fiscal Agent - Average	Budget	\$12,221					
Service Provider: Title I Youth		\$50,000					
Service Provider: Title I Adult & Dislocated Worker		\$50,000					
One-Stop Operator (\$50,000-\$70,000)		\$70,000					
		\$222,221	183,872	247,451	189,961	238,002	159,130
=/-Total Budget Estate vs. Formula Administrativ	e Budget Allo	cation	(\$38,348.99)	\$63,579.00	(\$57,490.00)	\$48,041.00	(\$78,872.00

 Region Map 6 offers higher number of regions. The administrative budgets won't cash flow without additional funding from Title Core Partners and IWD taking a reduced setaside share. The map has numerous regions doesn't conform to CC boundaries exactly.

REGION	Administrative		Population	Average	Combined
	Budget			Membership	
Region 1	\$	118,664	457,442	1,361	
Region 2	\$	68,655	230,858	580	
Region 3	\$	69,381	339,450	867	
Region 4	\$	77,110	236,817	507	
Region 5	\$	248,608	839,706	3,013	
Region 6	\$	328,656	830,032	2,179	

Regional Workforce Budgets - 6 Regions		Estimated Cost	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6
Local Board Operations		\$10,000						
Independent Local Board Support Staff		\$30,000						
	6% of Total							
Local Fiscal Agent - Average	Budget	\$9,111						
Service Provider: Title I Youth		\$50,000						
Service Provider: Title I Adult & Dislocated Worker		\$50,000						
One-Stop Operator (\$50,000-\$70,000)		\$70,000						
Total Budget Estimate		\$219,111	118,664	68,655	69,381	77,110	248,608	328,656
=/-Total Budget Estate vs. Formula Administrative	e Budget Allo	cation	(\$100,446.74)	(\$150,455.74)	(\$149,729.74)	(\$142,000.74)	\$29,497.26	\$109,545.26

Regional Workforce Budgets are based on evaluation of USDOL's definition of board support staff and one-stop operator responsibilities as well as FFY18 regional WIOA allocations.

Local workforce development boards and CEOs may submit written comments to the Realignment Committee. Comments may be submitted individually by members or collectively by boards. Comments must be submitted on or before May 4, 2018, by email to: Shelly .Evans@iwd.iowa.gov.

Informational Talking Points

- To reach the Future Ready Iowa goal by 2025, the largest segment of the targeted population (51,300) are adults age 25 or older with no recognized postsecondary education. This group makes up 68% of the targeted Future Ready Iowa population. Local WIOA and workforce training program partnerships are essential in serving serve this population. Therefore, regions representing labor shed and manageable areas for partnership are critical. Reducing workforce service regions to two or three regions in the state diminishes the efforts to accomplish the goals of Future Ready Iowa.
- The WIOA legislation requires workforce regions be consistent with local labor shed areas, and have a common economic development area (TEGL 27-14). <u>How will lowa remain compliant</u> with this requirement under the proposed regional restructure? What efforts were made to ensure local labor shed areas were considered? How do labor shed areas align with the larger areas suggested?
- A suggestion by the State Workforce Development Board subcommittee to have former local boards serve as advisory committees or subcommittees is unrealistic. Local boards at times can struggle for membership and participation, even though members are appointed by the governor, and have the ability to make decisions that will impact their local area. The assertion that a local subcommittee, without any real power would sustain and have true input is unrealistic. Keeping regions as small as possible is the best option for engaging with the full region.
- Electing to realign to two workforce regions would <u>leave Iowa with the fewest workforce</u> regions of any mid-west state. Nebraska would be the closest with 3 regions, and they have 1.22 million fewer residents. How do you justify aligning to the 2 region map? Has research been completed to determine how Nebraska and other mid-west states support WIOA administrative costs like one stop operator and board support while maintain more regions which allows for more local control?
- Can you clarify the process used to determine costs for board staffing and one stop operator? Was consideration given to having multiple areas share these costs?
- While currently there are no plans to close workforce offices, realigning to fewer regions would give the state power to close workforce offices, as federal law only requires 1 one-stop office per region. Since leadership and priorities can change, what steps are being taken to preserve the current level of workforce offices to ensure an ongoing basic level of services and access, especially for the rural communities, as regions are reduced? Protections are needed.
- <u>DOL requires all partners who participate in the workforce system to contribute to</u> <u>infrastructure costs which can include one stop operator and board support</u>. How can WIOA Title 2, 3 and 4 state they have no funds to contribute to these infrastructure costs? That doesn't align with DOL requirements. In addition, recent DOL grants are requiring partners to contribute to the cost of workforce infrastructure. Won't DOL be asking how or requiring Titles 2, 3 and 4 to demonstrate how they are contributing to infrastructure costs? Shouldn't this cost sharing be developed now to head off issues later with future DOL monitoring?

- <u>The initial draft budget for WIOA Title 1 services has been released and the state of Iowa is</u> <u>choosing to set aside the full amount allowable under federal law.</u> This is a departure from last year. What is the state of Iowa choosing to do with those funds outside of those earmarked for specific work like DW rapid response meetings? A recommendation is to use a portion of those funds to support the cost of WIOA infrastructure.
- Training and Employment Guidance Letters (TEGL) 16-16 expressly requires that there be one comprehensive American Job Center in each region. <u>Other offices would be considered affiliate offices</u> and have their own set of requirements as to which partners need to be present for it to even be an affiliate center. <u>How will the decision be made as to which centers will be kept as the comprehensive American Job center one stops</u>?
- Training and Employment Guidance Letters (TEGL) 16-16 emphasizes <u>that all one stop partners</u> are required, under WIOA sec. 121 (h), <u>to support the infrastructure costs</u> and certain additional costs of the one stop delivery system. The one stop operating budget consists of two types of costs—infrastructure costs and additional costs (which must include career services and may include other shared costs and shared services). WIOA introduced mandatory funding agreements, with particularly detailed requirements for funding of infrastructure costs. 20 CFR 678.700, 34 CFR 361.700 and 34 CFR 463.700. This information is available under TEGL 16-16 Page 21 and also includes the requirement that the Governor issue guidance on one stop infrastructure funding.
- CFR at 678.620 provides information on the <u>one stop operator's role</u> within the one-stop center. The <u>minimum requirement is for the operator to coordinate the service delivery</u> of the required one-stop partners and service providers. When calculating the costs for this position the State has budgeted for \$100,000 to perform the function and considers this function to be strictly administrative. While the local RWDB may add duties to this role, there are many duties which are strictly prohibited from being performed by the one stop operator, <u>most of which would be considered administrative such as budgeting, negotiating performance etc. Most of the duties which the CFR and the other DOL issued documents suggest are providing services which is <u>actually a program and not an administrative function</u>. This brings into question how this position can be funded (just administrative funds or necessary program funds) and if the role needs to be a full-time position at \$100,000.</u>

Attachment E, Page 5

Four Regions - Option B



\$294,811

=/-Total Budget Estate vs. Formula Administrative Budget Allocation

\$315,148

\$20,337

\$359,201

\$64,390

\$316,212

\$21,401

Regional Workforce Budgets are based on evaluation of USDOL's definition of board support staff and one-stop operator responsibilities as well as FFY19 regional WIOA allocations.

Five Regions - Option A



Attachment E, Page 7

Five Regions - Option B



Six Regions



Regional Workforce Budgets - 6 Regions		Estimated Cost	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6
Local Board Operations		\$10,000						
Independent Local Board Support Staff		\$30,000						
	6% of Total							
Local Fiscal Agent - Average	Budget	\$9,111						
Service Provider: Title I Youth		\$50,000						
Service Provider: Title I Adult & Dislocated Worker		\$50,000						
One-Stop Operator (\$50,000-\$70,000)		\$70,000						
Total Budget Estimate		\$219,111	118,664	68,655	69,381	77,110	248,608	328,656
=/-Total Budget Estate vs. Formula Administrativ	e Budget Allo	cation	(\$100,446.74)	(\$150,455.74)	(\$149,729.74)	(\$142,000.74)	\$29,497.26	\$109,545.26

REGION	Adm Budg	inistrative get	Population	Average Membership	Combined
Region 1	\$	118,664	457,442	1,361	
Region 2	\$	68,655	230,858	580	
Region 3	\$	69,381	339,450	867	
Region 4	\$	77,110	236,817	507	
Region 5	\$	248,608	839,706	3,013	
Region 6	\$	328,656	830,032	2,179	

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