



Iowa Workforce Development Board

Realignment Committee

Last Updated: 6/1/2018

QUESTIONS / COMMENTS RECEIVED

REGION I

Region I	Questions / Comments
<p>5/3/18 Delaware County Board of Supervisors</p>	<p>First and foremost, it is our understanding that the regional system was set up in the first place to allow the clients great opportunity to access the system. The federal mandates do not seem to align with what our core values are, and should remain. By reducing the number of regions and centralizing the locations where decisions are made, we lose our ability to serve the people who need our services the most.</p> <p>With changes in regions, our unemployed citizens would have to travel to Dubuque or Decorah to a work force office. Our Board is concerned that the future of our businesses, employees and local economy is in jeopardy if the proposed plans for less regions move forward. Our citizens deserve the opportunity to be employed, to get better jobs, and to improve their lives.</p> <p>We see the potential for politics to unduly influence who is selected to provide services. While we have no experience with the people from other regions, the quality and experience of our local staff will be compromised no matter what happens.</p> <p>To keep this from being rural vs. urban, we feel that there should be no less than 6 regions, so that our citizens and businesses and industries still have a voice/presence close to work with. Maintaining accessibility to lowans in need of service, and focus on .employment needs in all parts of Iowa is essential.</p>
<p>5/3/18 Pat Murray</p>	<p>As a member of the Region I CEO Board, I am strongly opposed to the proposed 2 Region Realignment. Citizens of Howard County already must travel to Dubuque to the 'one stop' regional office. Thankfully, Decorah has a satellite office that serves our workforce needs.</p> <p>A 2 Region Realignment would be a disaster for rural Iowa. Clients who need these services are the least likely to have the means to travel 80-120 miles to the nearest office.</p> <p>If the goal is to make Workforce Development Services practically impossible to receive in rural Iowa, then the 2 Region Realignment is perfect.</p>
<p>5/3/18 Allamakee County Board of Supervisors</p>	<ol style="list-style-type: none"> 1. We support the eight-area proposal. This would require less travel for both program participants and board members. 2. The Decorah office should remain open. It serves the rural areas of Northeast Iowa and provides many valuable services to program participants. 3. We do not support the two area realignment plan. The size of the area would result in less service to rural Northeast Iowa. It would also result in less board participation from the rural areas.
<p>5/3/18 Fayette County Board of Supervisors</p>	<p>We as Supervisors from Fayette County in region I representing the RWDB/CEO board have concerns with serving and protecting our residents if we drastically reduce the number of regions in realignment.</p> <p>While we believe our residents can be served with less than 15 regions we do not believe a drastic reduction will allow the rural residents to be served as they should be and deserve to be.</p> <p>We have been told the Supervisors are to be more involved, but the number of Supervisors involved will be reduced with a reduction in regions.</p> <p>We have been told the administration cost per region is to be \$350,000 no matter how many regions without how the \$350,00 was arrived at.</p>
<p>Region I Members</p>	<p>My recommendation for realignment of the Regional Workforce Boards would be NO LESS than six (6) regions. I understand we have to look at the reduction of 15 regions and going to 6 regions would still give the rural population a voice on what happens on the regional workforce boards. It is important that this doesn't become an urban versus rural issue. Also our unemployed and underserved</p>

Region I	Questions / Comments
	<p>citizens should have the opportunity to get to a “field” office that doesn’t hinder their ability for travel and getting the one - one assistance they need. Our Iowa Workforce Development offices are so much more than signing up for unemployment...</p> <p>We understand the mandate to reduce the number of regions for cost efficiencies. <i>This must be done in conjunction with the focus of the quality of delivery of service to the end user – our client.</i> So much of the data we are sent for consideration is the unemployment by county for the state of Iowa. It has been 20 years since the “unemployment office” stigma was shed and we are blessed with the “Iowa Works” – workforce development.</p> <p>These <i>offices assist with so many services that have little to do with unemployment</i>; such as NCRC career readiness assessments, apprenticeship and training development, upskill training, and application assistance. We as employers have developed training, hiring and advancement processes that include participation AND access to the Iowa Workforce centers. Should the reduction in the number of regions correlate directly to the reduction in the number of resource centers, businesses and the clients that are being served by Iowa Works FOR the businesses will be negatively impacted. Think of it this way: <i>If a family is used to eating 17 meals a week, and the budget gets tight – we don’t cut our meals back to 2 per week, or 4 per week, etc. The family’s needs still need to be met, but the budget impacts the menu and where we obtain food.</i> The same can be said for access to one stop centers. If there is a budget issue, look at what is being offered at each location to see where economics can be improved. We could improve delivery, collaborate secretarial/administrative duties, etc. via remote access/website connectivity; but the thought that someone from Sheldon, IA is going to make it to a workforce center in Decorah, IA is just not realistic. Clients will decide not to utilize services, and as a result businesses will make the decision to factor that out of their programs, and none of that is good.</p> <p>For the new map alignment, I would suggest as my preference the 5(b) distribution, and if possible would say map 6 to be ideal if budget could be figured out. These are far and away better than the 2 or 3 region offerings discussed earlier.</p> <p>I have great concern with what may happen to our rural communities (and beyond) should it be decided that we realign our Workforce Development Boards into fewer areas. There are a couple of reasons unemployment is low in Iowa today, one of course because of the thriving economy, but two, because of our hard-working Workforce groups who work diligently to place those workers whom have lost their jobs due to a company closing (for example). Fewer areas within our workforce group, I fear, will send fewer staff members out working to place these same individuals in the future. Maybe forcing the Workforce group to set criteria to choose where they can setup onsite services when a company is closing, therefore not truly serving all our people as we should. I worry that such a realignment would also mean closing some of our One Stop Centers. And although I realize a lot of things can now be done online or over the phone for unemployed individual, I feel that human contact is extremely important for allowing these same people to develop soft-skills for getting back into a work environment. Also given fewer areas, will make it harder for the Workforce Group to educate businesses on all the services that are available to assist them. I fear that should we realign our areas we will see unemployment rates start to rise again.</p> <p>I don’t disagree that some consolidation has to happen due to the deficits of the program. I do feel that consolidating from 15 regions down to 2 regions is drastic and will cut necessary resources and harm the local rural offices too much. Having unemployed clients drive one or two hours to an unemployment office for training and assistance will not work. I feel that consolidating to 6 to 8 offices could work, but local resources would still be cut. The map that I liked the most was the 6 region map. I also feel that some of the fixed costs across the board could be cut by sharing board support and Service Provider Admin support across regions. So overall, I feel the regions should be consolidated to 6 to 8 regions where some of the admin costs could be shared across regions. Thanks</p> <p>In the breakdown of Administrative Costs on page 3 of the Realignment Committee Framework, you show \$350,000 as the total cost per local area per year, but there is no explanation for each item and no indication on how these numbers were derived.</p> <p>\$100,000 for Independent Board Support - we currently pay about \$3,000 annually in our region for this service. Why is there such a big discrepancy? Is there a job description available that outlines what is specifically required of this position? Would there be an opportunity for this person to serve multiple regions so the cost could be shared and significantly lowered for each region? How was this amount calculated? \$100,000 for One-Stop Operator - Is there any description on what is required of this role to justify the cost? Would there be an opportunity for this person to serve multiple regions so the cost could be shared and significantly lowered for each region? How was this amount calculated? \$20,000 for Local Board Operations - we have consistently allocated less than \$5,000 annually in our region for this service. Why is your estimate so much higher? How was this amount calculated? \$30,000 Local Fiscal Agent - Is there any explanation for what is required to justify this cost? How was this amount calculated? \$50,000 WIOA Title I Youth Service Provider - Is there any explanation for what is required to justify this cost? How was this amount calculated? \$50,000 WIOA Title I Adult and DW Service Provider - Is there any explanation for what is required to justify this cost? How was this amount calculated?</p> <p>These costs appear to be extremely inflated; more realistic figures along with possible shared costs would definitely lend credibility for a significant increase in the numbers of regions being proposed. Why does it appear that WIOA Title I is responsible for the entire \$350,000 in Administrative Costs? TEGL 17-16 states that all one-stop partner programs must contribute to the infrastructure costs and certain additional costs of the onestop delivery system based on their proportionate use. Therefore, shouldn't these costs be shared among the partners? What are WIOA Titles II, III, and IV currently contributing in Iowa? IVD is allowed to keep a maximum 15% of each program budget for state set aside when the WIOA Title I Adult, DW, and Youth funds are received by the state. What are these funds currently being used for and what is the anticipated use in the future? Couldn't some of these set-aside funds be allocated to cover a significant portion of these Administrative Costs? The Criteria for Local Area Designation on page 4 of the Realignment Committee Framework indicates that WIOA identifies that labor market areas and economic development areas should be</p>

Region I	Questions / Comments
	<p>considered when making this decision. The two region plan that you are proposing does not appear to account for either of these factors. It would be much more effective to look at combining some of the economic development regions in Iowa which are very closely aligned with the current labor market areas, community college boundaries, and workforce regions in our state? The Maintain Local Input on page 5 of the Realignment Committee Framework indicates that the current RWDB and CEO boards would serve as advisory boards under the RWDB and CEO board for the new two-region realignment being proposed. In that role, advisory board members would have very limited influence since they would not have an actual vote on any issues within the new region. In our region, the CEO board contains a representative from each of our counties. Therefore, every county has a vote that matters and the rural counties have a much larger influence on the decisions than the urban county. How will your new regional structure ensure that rural areas don't get left out regarding the workforce services that their residents need and deserve? When Local Area Agencies on Aging were reduced to six a few years ago in Iowa, they tried something similar by transitioning the previous board members into advisory board members with no meaningful role in determining the services that are provided or how the money is spent in the new area which created a negative impact in the rural areas of our state. WIOA legislation requires that states have at least one One-Stop Center in each local area. Therefore, Iowa is currently required to have 15 One-Stop Centers due to 15 regions at the present time. What is the plan for the future number of One-Stops in Iowa? How could a reduction in the number of local areas potentially impact the four IowaWORKS Satellite offices and the IowaWORKS Expansion offices listed on the IWD website?</p> <p>While it may make sense for some of the current regions to combine, consideration must be given to the travel required for customers (job seekers and employers) to access services at their nearest IowaWORKS office, as well as, board members to participate in meaningful discussions. Low-income individuals, public assistance recipients, and dislocated workers do not have the resources to drive long distances for necessary services and, unfortunately, electronic access only is not sufficient to meet their needs.</p> <p>The U.S. Department of Labor has mandated the realignment of Iowa's local workforce development areas. However, the State of Iowa, as discretion in how to make those alignments. Any consideration for realignment needs to maintain its focus on the many groups it is designed to serve: displaced workers, individuals seeking employment, individuals with disabilities that are seeking employment and businesses and industries that are recruiting skilled and non-skilled labor. Obviously too great a reduction in areas or field offices will adversely impact the very people that Iowa Work Force Development is designed to help.</p>

REGION 3 / 4

Region 3 / 4	Questions / Comments
<p>3/22/18 Susan Golwitzer</p>	<p>I am on the RWDB for Iowa Region 3&4 representing Business for the largest county in Iowa, Kossuth. Today at our meeting in Spencer Iowa, which I drive 65 miles to attend, we discussed this re-zoning that is being considered by officials that do not understand the areas affected by the proposed changes.</p> <p>At the current time, we as a working, active board, are considered a very viable part of the area. Our office works with business, individuals, colleges, and several entities to provide Iowans the best opportunity to better their lives.</p> <p>Under your current proposal, you are looking to move those services even further away from those entities that need these and use these services. We discussed today how a business in the area, who without the direct interaction from our area service agency and people in Spencer, would have moved their developing organization out of Iowa. Is this what we want? As we try and grow Iowa?</p> <p>Right now today, as I sat in our board room, with the widows facing the street, I saw many people entering and leaving the offices after receiving help. Although I did not take a survey, I was amazed at the amount of different individuals I saw coming and going. You need to understand that in Rural Iowa, since the demise of the local offices in every town, these sparsely located offices are critical to the survival and education and EMPLOYMENT of our people in our state. The services are so needed.</p> <p>You can see by our low unemployment numbers that something works, and it is us, the local area offices that makes the difference.</p> <p>As an HR Manager I can tell you that these local services provide the training needed to ensure we have at least a workforce that is willing to learn, and the skillset to understand the work ethic needed to move forward.</p> <p>We do not have the luxury nor do the people served by our local office, of public transportation, or being able to walk to an office, but need to rely on whatever way they can to get to an office. This is critical, look at the numbers served, by our region and our services, and if anything use our Region 3&4 as a vision for others to pattern after, not to try and consolidate and make us more sparse and our resources to help others less and less.</p> <p>Is the vision of the work force in Iowa to really divide us in half and make our sources more difficult for employers and people and potential employees? Or to help employers and employees in Iowa?</p>

Region 3 / 4	Questions / Comments
<p>4/24/18 Greg VerSteeg</p>	<p>As vice-chair of the Region 3/4 RWDB I thought I'd submit the minutes from our conversation at our January 25, 2018 meeting concerning this issue. We believe it is important to have this conversation entered into the public record associated with this realignment effort.</p> <p>Region 3 & 4 Chief Elected Official Board and Regional Workforce Development Board Combined Meeting - Thursday, January 25, 2018 - 9:30 a.m. to 11:30 a.m, Governmental Services Center, 217 West 5th Street, Spencer Room B</p> <p>RWDB Members Present: Jason Anderson, Reva Arends, Lee Beem, Mike Carlson, Janet Dykstra, Susan Golwitzer, Linda Gray, Kristin Hanson, Rhonda Jager-Pippy, Tim Kinnetz, Lori Kolbeck, Diane Nelsen, Vernon Nelson, Scott Rettey, Mike Schulte, Ranae Sipma, Carrie Turnquist, Kenneth Vande Brake, Benjamin VanDonge, Gregory Ver Steeg, Lisa Washington / RWDB Members Excused Absence: Kiley Miller, Dave Swanson / CEO Members Present: Dale Arends, Roger Faulstick, Arlyn Kleinwolterink, Merle Koedam, Mike Schulte, John Steensma, Pam Wymore / CEO Member Absent: Barry Anderson / CEO Members Excused Absence: Pam Jordan, Tim Schumacher</p> <p>12. Update on Realignment Committee meetings held in December and January</p> <p>Val - participated through phone on the committee meetings that have been held so far. The November minutes are in the packet. Thanks to Michael for the meeting minutes. At the meeting on December 6th basically three region structures were presented to the committee. The three scenarios were four regions, three regions, and two regions. They indicated the only scenario they could really afford was the two region scenario. This is not a "yes" committee – there is a great deal of discussion and the committee is very interested and engaged and wanting to do the right thing, with considerations of the citizens of Iowa. IWD continues to state that no offices will close, and at this time no staff will be displaced. However, it has been pointed out to the committee that if they move to a two region certified One-Stop, it makes it easier to close offices. Even though closing the offices isn't a consideration now, future budget constraints may influence that. Committee asked to see maps of 6, 7, or 8 region scenarios. Next meeting is set for February 9th from 12 to 2pm. Val will send call information out to everyone so anyone can listen in.</p> <p>Rosie - State board will be meeting quarterly because committee won't have a recommendation in place by February or March. Want to hear what people are thinking, and what will happen with currently existing boards. Other boards could exist under new regional boards, but committee is concerned that people will be lost.</p> <p>Question – If you're going to large regions but keeping small groups active, where is the financial savings?</p> <p>Rosie: That's the question – because no cost will be assigned to this. DOL said that all the money really needs to come to the region, and then have someone in the region to put that money out. What would 2 regions look like? Current maps strictly divided by population and money. Rosie: The committee was not impressed with that map. As Ben said in our last meeting, is it really going to be a cost savings, or are we just shifting how we spend the money? If you hire fulltime board support those dollars will get spent, where we have a more conservative spending habit locally. That scenario really needs to be looked at of how money will be saved.</p> <p>Janet – we've asked to see how the new plan will save money. We need to see a comparison.</p> <p>Lee– it seems like their one concern is saving dollars, but are they going to?</p> <p>Diane – Feels like she has a good grasp of this area of the state, particularly education, but views are totally different than what Des Moines area schools see. These vast differences in needs of population, or what's happening in the area, would be very different and puts us at a disadvantage because we'll have a different perspective. Metro area doesn't understand rural Iowa, it's like we're a foreign country. It doesn't serve any of the rural areas to put Polk county in a region with any of us.</p> <p>Rosie – Senator Bill Dotlzer suggested that Polk be separate</p> <p>Val – a lot of push back about rural voice and concern that the rural voice is being heard. Thankful that they're willing to consider having a local board meet, but it will probably be advisory rather than having an actual vote.</p> <p>Diane - How long of an advisory group existence does it take for someone to decide it is no longer needed?</p> <p>Rosie – I don't think 2 regions will realistically be considered. As hard as the decision is, it will be the implementation that will be key. The decision is really just the first baby step.</p> <p>Lee – all the changes we've made through the years have worked, simply because of the input at the local level.</p> <p>Rosie – whatever is decided, don't stop talking don't stop pushing. This is the board's decision, but implementation is going to happen locally and regionally.</p> <p>Diane - hard to imagine how it will run, without any guidance as to what the committee is thinking for representation</p> <p>Janet – what if this was tracked more in terms of performance instead of just numbers? Conversation – group agrees, success rate rather than just quantity. Look at unemployment for our area compared to rest of the state.</p>
<p>5/4/18 Pam Wymore</p>	<p>As a CEO member of WIOA Region 3 / 4 Board I am very concerned about the proposed realignment of the state of Iowa WIOA Regions. Region 3 / 4 has a very engaged local board who will no longer have any authority to make decisions regarding Northwest Iowa. The new proposal is to establish advisory boards. Most advisory boards soon lose their commitment when they realize they may or may not be heard and have no authority. How were the costs regarding the new regions determined? Region 3 / 4 currently spends about \$3000 a year on board support. The new proposal has budgeted \$100,000 for an administrative position for board support, this seems excessive when compared to Region 3 / 4 costs. How will these positions be funded in compliance with the DOL? The</p>

Region 3 / 4	Questions / Comments
	<p>WIOA legislation requires workforce regions be consistent with local labor shed areas, and have common economic development area. How do labor shed areas align with the larger areas suggested? Reducing workforce service regions to two or three regions diminishes the efforts to accomplish the goals of Future Ready Iowa. What steps are being taken to ensure an ongoing basic level of services and access? Currently there are no plans to close workforce offices but realigning to fewer regions would give the state the power to close offices. Rural Iowa communities, such as mine, has seen the closing of local offices of both Iowa Workforce and DHS forcing our citizens to travel over an hour for services. The suggested remedy is to access services on line with computers while these are the very people needing training on computers. At the very least, Iowa needs four Workforce Regions, five or six would be better. As Iowans we have many things in common but are also unique in our areas and communities. Having lived in southwest Iowa in a larger community for 26 years and now 44 years in a small rural community in northwest Iowa, I have personally observed the differences. I feel that lumping all of Iowa into two regions would not benefit the future of Iowa and our job markets.</p>
<p>5/4/18 Pam Jordan</p>	<p>I am a Chief Elected Official of Region 3 & 4 who has served in this capacity for over 10 years. In that time, Workforce Development Boards have undergone many changes in organization and management. The first draft of the current realignment proposal has many flaws and I express some thoughts of our Board as to why we think so. The proposed plan for a two-region configuration statewide ignores several requirements of the USDOL for realignment of WIOA regions:</p> <ol style="list-style-type: none"> 1) TEGL 27-14 requires workforce regions to be consistent with local labor shed areas and have a common economic development area. There are no elements of the plan that address this. 2) Two workforce regions statewide would leave Iowa with the fewest workforce regions among mid-western states. There is no evidence or model for how this would work. The complexities of the past few years of local boards integrating new partners (e.g. Department of the Blind, etc.) has been challenging enough due to vast distances and territories. Two- region logistics would be even more unworkable, making services farther and farther away from hard-to-reach, non-technical potential labor populations. 3) In addition, to reach Future Ready Iowa goal by 2025, the largest segment of the targeted population (51,300) to be reached are adults age 25 or older with no recognized post-secondary education. This group makes up 68% of the Targeted Future Ready population. This group requires intense and consistent one-on-one, multi-partner assistance. Transportation is a critical factor in rural Iowa. Creating vast geographical regions would negate efforts to accomplish the goals of Future Ready Iowa. 4) DOL requires all partners who participate in the workforce system to contribute to infrastructure costs which can include one stop operator and board support. Not factoring in WIOA Title 2, 3 and 4 as contributing funds skews your budget from the start. Shouldn't this requirement be addressed in any plan to prevent issues later with DOL monitoring? Including these funds makes smaller regions possible. Rural areas have an admirable history of efficiently sharing costs and resources for optimum outcomes. In fact, Region 3&4 is a model for the state in this regard. 5) The creation of Advisory Boards to make up for lack of power in decision-making by only two regional boards, was met with extreme skepticism by my Board, many of whom had been through such shams with other boards. Furthermore, the whole concept of Regionalism sent a collective shudder through them all as all counties are continuously grappling with the grim realities of the regionalization of Mental Health and the Department of Human Services. The people suffer. <p>In conclusion, I believe the consensus among my Board members was to support minimum reductions in regional configurations as can be accomplished within the DOL guidelines and cooperative partner funding</p>

REGION 5

Region 5	Questions / Comments
<p>4/27/18 Larry McBain and Doug Bailey</p>	<p>Region 5's core and local partners have done a great job working together in order to help out members of the community. We wanted to showcase a few of the recent success stories that display how local control is so valuable not only the client, but the businesses in our region. Harold is a 62 year old male who began coming to the IowaWorks office in Fort Dodge on January 3, ct_ He is living in the Fort Dodge Residential Facility after spending nearly half his life in the correctional system. He had many barriers to overcome to find employment with the most significant being the type of offense on his record. From the beginning, he showed his commitment to turning his life around and finding employment. On that first day he spent 5 hours in the office creating his resume, searching for jobs and meeting with staff. He was very open and honest with staff members concerning his past. We discussed his barriers and started putting together a plan for him to find a career. Harold took to heart the term "finding a job is a fulltime job". It wasn't unusual for him to come to the office 5 to 7 hours each and every day to look for work. He has a background in animal care., and while in prison he also earned certifications in metal finishing and janitorial services. While in the office he wanted to benefit from all the resources that were available. One of the first things he did was take the National Career Readiness Certificate assessment, and he was extremely proud of the certificate he earned. Harold also worked with the PACE/GAP staff and took a week-long class in which he earned safety certification. As Harold continued his job search without any success it was not unusual for all office staff, including core partners, to spend the morning meetings bouncing ideas off of each other to come up with additional ways to assist him. During the three month period he visited the center he researched countless employers and completed nearly 90 applications. He kept getting rejection after rejection and every time our staff heard him say each rejection just makes him stronger and makes him want to work even harder. There were days however when everyone in the office could tell he was getting down and made sure they offered him encouragement. He often said the support and encouragement were the only things that got him through the day. On March 27th he had an interview with Seaboard Foods in Iowa Falls. Within three hours, he received a call from them telling him they were very impressed with his skills and honesty during the interview. They offered him a job in the Hubbard area working in a wean to finish hog operation, which was exactly the type of job he wanted all along. He will start out making \$2,800 to \$3,000 per month. When he came to the office to let us know about the job offer he said, "There are people out there who say they will help but they really don't. Everyone in this office is remarkable and truly helped me. There were a few days when I was ready to tell them to just send me back to prison but the support I received here kept me from doing that." Jen Liddell heard about the Integrated Manufacturing Advancement Program (I-MAP), one of the career pathways created with the help of local input, and was instantly intrigued, she knew in order to support her family, she was going to have to make some life changes. Jen did extremely well throughout class. During the last week, mock interviews were given by the Title I and PACE/GAP staff. The last day of class is career day where local businesses come share about opportunities in their company and perform interviews. She was encouraged to fill out an application at Chantland. Jen was given the chance to come in for an interview, she was offered a Drilling and Tapping position at Chantland's south plan, and started February 5th! The I-MAP instructors were very happy for Jen because she worked hard and was one of a few students to go above and beyond our expectations for class. Jen is now employed full time and is currently continuing on her career path by taking the Beginning Welding certificate program through Iowa Central Community College. Jen wen! from an entry level position in the food service industry to a career in manufacturing where she can support her family. Heath Bass was interested in completing his HiSED and pursuing a career path that would help support his family. Through the partnership that was created with Title I and Title II, a two day orientation was created. During this event, one of the career navigators talked about the resources students can receive while pursuing more education. Making the personal connection with the navigator, Heath learned about the Beginning Welding certificate. Heath showed immediate interest He had previous experience welding but was unable to find employment because he wasn't certified, Heath was concerned he wouldn't be about to attend due to financial reasons, He had a household of 4 to support and wasn't currently working in order to concentrate on his HiSED, After completing the application process, he was approved for the GAP program to cover the cost of tuition and PACE for the transportation cost In June, Heath will have completed the HiSED' and be certified in welding. The education he will have received will open many career opportunities, without programs like Adult Education, Title I, PACE, and GAP, he would be limited to working entry level jobs barely making ends meet for him and his family. These are just a few of the many success stories Region 5 has to share. Many of these students would not have been as successful without the one-on-one attention they each received. Expanding the regions in order to save some money is not the goal the state should have, the goal is to help clients enter the workforce with a new-found confidence level. The personal attention Region 5's core partners, local partners, businesses, and education providers is outstanding. One phone call to one of the local contacts can change a person's life in a matter of minutes.</p>
<p>4/27/18 Larry McBain and Doug Bailey</p>	<p>The Region 5 Workforce Development Board is writing regarding your proposal to realign the regions around the state. With customers being the number one priority, reducing the number of regions in the state causes many concerns for us. Employer engagement is a core function of a Local Workforce Development Board. Since the transition to the new board matrix, Region 5 Workforce Development Board has developed a much stronger board with employers that are highly engaged and see the impact that a local board can provide in terms of developing and delivering practices that meet the needs of businesses and job seekers in the local area. Engaged employers and WIOA core partners have the ability to help solve local workforce issues and research new & effective solutions to make the communities and businesses grow. Another primary function of the Local Workforce Development Board is the development of career pathways. Local relationships, knowledge, and control is what drives the success of these pathways. Education providers, businesses & WIOA partner staff in Region 5 have worked together to create a variety of opportunities for those needing to upskill or re-enter the workforce. Having a close partnership between all and without the insight of local businesses, these career pathways would not have been developed that met the specific needs</p>

Region 5	Questions / Comments
	<p>of the local area. Below are a few of the pathways that have been implemented and have proven successful. A local business, who is a board member, shared insight into how valuable these classes have been in developing skills for potential employees.</p> <ul style="list-style-type: none"> • Basic Safety • Beginning Computers • Beginning Welding • Certified Nurse Aide • I-MAP (Integrated Manufacturing Advancement Program) • Novice Computers • Workplace Readiness <p>A suggestion of the realignment committee was to reduce the number of regions to two and to turn local boards into advisory boards. This would take away all decision making power from the local areas. Advisory boards do not have the same effect and meaning. Businesses are not going to volunteer to sit on a board where they see no positive impact coming back to their areas. Rural areas around the state will not be heard. The businesses will not have the qualified job seekers that are needed. The more layers in the process of opinion will lead to the local areas having no voice, and advisory boards will lose their effectiveness. By only having two regions, there will no longer be input at the local level into the services that meet the unique needs of each area, and there is a concern that the voices of rural areas will not be heard when combined with larger, more metropolitan areas. There needs to be equal representation of people in order to enhance the local workforce areas. Large employers do not have the same needs as small businesses. Small businesses struggle to get started and by taking that voice away, some businesses may not be able to continue. Local boards are also responsible for ensuring that a local plan and MOU are developed. These identify how the core partners within the region will work collaboratively to deliver services that meet the needs of job seekers and employers. Local processes were developed that meet the specific needs of this area. Being able to implement this requires that the local board and core partners have a strong understanding of the needs of the area and close communication. With this, Region 5 was able to develop specific strategies that were implemented to break down some of the barriers our target demographic were facing. Transportation and daycare are two huge obstacles many of our clients face. With the collaboration of the core partners and the board members, Region 5 was able to help eliminate some of the stress that goes along with these barriers. Being able to convene local stakeholders is crucial to local workforce boards and bring necessary stakeholders to the table. In Region 5, an example of this is a developing relationship with the prison, with a focus on creating partnerships to meet the needs of those re-entering the workforce. Prison employees have shared information about the success of their apprenticeship programs, which will assist in skill development for local employment needs. The four core WIOA partners have worked together to help implement strategies that will connect the clients and businesses.</p> <ul style="list-style-type: none"> • Monthly Core Partner Meetings • Business Services Team • Referral System <p>The Business Services Team has helped unify the message of the core partners. This team has helped streamline all activities that are available in our region. The partners also actively engaged in an Educator & Employer Summit to discuss how to educate the younger generation on the opportunities the local area has developed. Without these locally based learning opportunities, the voice of the smaller communities will not be heard. Along with the great communication our partners have, the referral system that was implemented has become a great success tool. The core partners are all within walking distance of each other. Many of the clients Region 5 have become co-enrolled in programs and have been able to take advantage of many resources that may have been missed previously. The core partners are in constant communication about clients and ways to better our programs.</p> <p>The Realignment Committee has stated that they attempted to maximize services to lowans and input at the local level. It is understood that the number of regions does need to decrease. The best solution in order to maintain a voice would be four regions. With this alignment, most of the territories would match up with all 4 WIOA Core partners, as well as the community college boundaries. These four boundaries would take into account similar LMI patterns. Each corner of the state has similar industry growth. The northwest corner of the state is in need of supporting the healthcare, manufacturing, and transportation industries. Although there are many other industries we support, Region 5, along with others, have a gap to fill in these sectors.</p> <p>Keeping regions smaller and local allows customers to be more personable. A person searching for a better path is looking for a mentor, not someone who is going through the motions. Having the personal support from the staff can occasionally be the only support one of our clients might be getting. With the connections In our region, many barriers can be addressed and broken with a simple phone call and collaboration. Making these regions larger is only going to take away from the personal touch. For example, there was a student who recently was interested in taking a short term certificate program. Not having much money, the student was not going to be able to make it to class. With the programs policy, transportation reimbursement couldn't be dispersed without attendance sheets. Calling on a local partnership, our staff was able to get transportation assistance within a few hours of the student disclosing the barrier. What currently is a somewhat simple solution will turn into a lost, frustrated student with larger regions. Watching a customer grow, become confident, and passionate about their career field is what our partnerships strive for. Recently, a student was</p>

Region 5	Questions / Comments
	<p>enrolled in HiSED. Title I and Title II work together on an orientation every new session. During orientation, this student was encouraged by the support that was being given every step of the way. After completing HiSED and taking some of the workshops that are offered at the One-Stop, this student decided it was time to continue on a career path. This student has been doing great and almost has completed the first year of the degree. Next May, they will receive their diploma. This student's life completely changed when walking into HiSED and realized there is help out there if a person is willing to seek it. Region 5 sincerely hopes you take into consideration how local control is valuable to the customers, who are the number one priority. It's hard enough for a person to ask for help, but keeping the friendly faces of the community helps a person in need. Knowing they aren't just a number and have several people in their corner rooting for them can be a game changer. The businesses, employers, and education providers have done a great job creating a system that has worked.</p>

REGION 6

Region 6	Questions / Comments
<p>4/25/18 Cindy Litwiller</p>	<p>Examining all the information provided, the map that makes the most sense is Map 5A. Other proposed maps have too large of regions or the regions are too extensive from the northern to southern border i.e. Region 1 on 4B and Region 5 on 5B. Map 6 is the most ideal but if it won't cash flow, I don't see that happening. There are very significant concerns with results of this attempted restructuring. Workforce is a priority. But I believe that all this will do is create more issues and severely impact those individuals that we are trying to serve.</p>

REGION 7

Region 7	Questions / Comments
<p>4/27/18 Deborah Collett</p>	<p>As a volunteer board member of the Region 7 Workforce Development Board since appointment in 1997, I have had the opportunity to participate in the original needs assessment process, the various updates to the strategic plans and have experienced numerous changes in direction and even name changes for this Regional Workforce Board. The recent federal DOL review findings and the need for realignment to achieve compliance have been the topic of discussion and concern for some time at our local RWDB board meetings. Following our RWDB meeting yesterday, I was authorized to send these comments on behalf of the Region 7 RWDB.</p> <p>Region 7 was fortunate to have members and staff that have allowed us to be a top performer in compliance with our mandate. Often "best practices" reported in state or national publications have been developed in our Region. We have been an excellent steward of the funding that our region has been awarded for decades. However, as the world is now a different place and the funding available to assist lowans in various programs ebbs and flows, the direction to stream-line operations is understandable. Having said that, this will be a chaotic period in our history of delivery of workforce programs and ultimately it will be our participants and/or consumers that will suffer the most. Our written comments to the Realignment Committee are as follows:</p> <p>EXECUTIVE SUMMARY: Meet all WIOA Requirements. Establish new Local Areas:</p> <p>After considering the proposed local maps, it is our recommendation that a larger number of areas would be the most favorable. Our preference would be for no fewer than 6 Local Areas of less than 20 counties each. With the number of factors to be considered, it becomes overwhelming to consider all the details involved in making this paradigm shift. However, I am confident once the decision is made and the plan put in place, adjustments can be made to address inequities or unforeseen consequences.</p> <p>EXECUTIVE SUMMARY: Maintain local input:</p> <p>The State Board is composed the 26 members <u>representative</u> of all areas of the state. The proposed Local Boards will be composed of members <u>representative</u> of the local areas they serve. As a RWDB board, we are opposed to <u>requiring the new Local Boards</u> to have the responsibility <u>to establish advisory committees</u> in each of the current 15 service delivery areas. It was a difficult enough task to find local volunteers to participate at the decision making RWDB board level. The information funnel idea sounds good to anyone who hasn't tried to implement it. The reality is that it doesn't work because the "committee advisors" quickly see they have no meaningful role to play other than to fill a slot on a list. The Local Boards, as unpaid volunteers, are going to be with enough on their plate without this additional redundant bureaucratic burden.</p> <p>EXECUTIVE SUMMARY: Maintain access to services:</p> <p>The priority is to maintain access for lowans who need these services. From all the information we've read, it appears that this is an area of agreement. The current structure of IowaWORKS field offices was the result of a significant effort to downsize just recently. Our board does not support closing any more offices due to the various issues for those who need in person services.</p> <p>Local Workforce Development Board Functions Summary:</p>

Region 7	Questions / Comments
	<p>The Local Workforce Development Board Functions Summary indicates some new elements such employer engagement, developing “linkages with employers” and establishment of industry and sector partnerships. This is a new vision for what that independent Local Board staff will be responsible for. Generally, all the other things listed are familiar to RWDB’s. The other new area is the responsibility to “hire independent staff.” This introduces some areas of concern and the exposure of now becoming an “employer” in Iowa. That’s probably why only one of the 15 areas hired a full time staff.</p> <p>Area Requirements and Model Budget: The Model Budget appears to be well thought out. There might be other funding sources from the state or local areas to be considered. However, ability to hire the independent staff will vary widely depending on the wage rates of a given metro vs rural area and for the skills level needed. At this time of very low unemployment, it’s been my experience that finding skilled employees, who will need to be very efficient in getting done all that’s required of them, may be a challenge.</p> <p>Who hires, fires and supervises “the staff” for the Local Board operations or the Local Board staff? How would each board protect its members from individual liability, when the local boards assume these human resources responsibilities? Where would the liability insurance, health coverage and other benefits funding come from? While I’m certain this must have been addressed during committee discussions, if contracting for staff, the staffing costs for hiring through a contractor were not part of the model budget proposed.</p> <p>Region 7 supports the effort of Iowa Workforce Developments Realignment Committee in its effort to make responsible decisions regarding area configuration and to make a recommendation that allows for compliance with all WIOA administrative agencies and government legislation. We are hopeful that you can find a successful way to realign our workforce boards and increase our efforts to provide high quality services to our most in-need at the local level in the most cost effective way. To this point RWDB’s have had little opportunity to participate in this process.</p> <p>Region 7 looks forward to being involved in whatever meaningful way possible to assist with this undertaking. Thank you for providing this opportunity to express our comments.</p>
5/3/18 CEO Board	<p>The Region7 Chief Elected Official (CEO) Board wants to thank the Realignment Committee for their work to realign workforce development areas in order to comply with the US Department of Labor findings. Our Board does, however, have questions and concerns on how the needs of our residents will be met and how we can maintain local input and oversight of services with the proposed Plan.</p> <p>Our primary concern is to ensure that residents in our Region have access to services. While the State may not be able to continue with the current 15 local workforce areas, we think it’s important to maintain as many areas as possible. Reducing service areas to two or three in the State diminishes the efforts to accomplish a Future Ready workforce and will not adequately ensure that quality workforce services are provided in rural areas. Depending on the demographics, laborsheds, and commuting patterns, we feel there may be alternative options to address sharing administrative staff, costs, and services while maintaining local governance and oversight.</p> <p>To ensure that workforce activities meet the needs of employers and job seekers and support economic growth in all regions, communication and collaboration with employers and service providers are necessary. Our Board believes that it’s critically important to keep <i>IowaWorks</i> field offices open to ensure all lowans have access to services.</p> <p>For years, we have found it difficult to recruit and maintain business partners to our Boards and to now relegate them to serve as advisory board members or standing committees is not in anyone’s best interest. To truly have well-functioning and purposing boards that are committed to workforce development efforts, RWD and CEO Boards must have the ability to make decisions that will impact their local areas. Our Board does not feel the proposed advisory committee structure would ensure that vital local input continues.</p> <p>Thank you for working on this important realignment initiative on our behalf. We appreciate the opportunity to provide comments by May 4, 2018. As we all know, workforce development programs and services are critical to the growth of our Region and the State of Iowa. We need the best possible option for long-term success.</p>

REGION 9

Region 9	Questions / Comments
4/12/18 Dawn R. Smith	<p>We the Cedar County Board of Supervisors understand that there is a need for more efficiency in the State. We also understand how some expenses could be shared between regions. However, we are opposed to the State Committee recommendation going to two regions as that doesn't reflect our workforce or labor shed. This would also be very restrictive to work under those circumstances.</p>
4/12/18 Jon Bell	<p>I, as a Cedar County Board of Supervisor, understand that there is a need for more efficiency in the State. I also understand how some expenses could be shared between regions. However, I am opposed to the State Committee recommendation going to two regions as that doesn't reflect our workforce or labor shed. This would also be very restrictive to work under those circumstances.</p>
5/2/18 Region 9 RWIB	<p>First and foremost, it is our understanding that the regional system was set up in the first place to allow the clients greater opportunity to access the system. The federal mandates do not seem to align with than what our core values are and should be. By reducing the number of regions and centralizing the locations where decisions are made, we will lose our ability to serve the people who need our services the most. In addition, we see the potential for politics to unduly influence who is selected to provide services. And, while we have no experience with the people from other regions, the quality</p>

Region 9	Questions / Comments
	<p>and expertise of our local staff will be compromised no matter what happens. We can't see any positive benefits that could come from combining our region with other counties such as Johnson, Linn or Dubuque Counties.</p> <p>We sincerely hope that the final regionalization ends up with the maximum number of regions that is economically feasible. Regardless of the final regionalization plan, we believe it is imperative to retain Davenport as the central office for the new region.</p> <p>Below are some comments from the Region 9 Regional Workforce Investment Board:</p> <p>"I believe it will be hard to maintain Business Representatives on Regional Boards even if they go to Four or Six Regions. It is always a challenge to keep Business Representative seats filled on the Local Board and if they have to travel very far to attend meetings, I see where there could be a problem.</p> <p>"Making the current Regional Boards as Affiliate Boards with no powers in making decisions will never work in my opinion. I cannot foresee many individuals wanting to attend meetings just to be briefed on what the Regional Boards have decided. In situations when Affiliate Boards make suggestions to the Regional Board for actions they would like to see implemented in their respective areas, those ideas may or may not be approved and action taken on by the Regional Board. "</p> <p>-John Tuthill, Region 9 Regional Workforce Development Board Member</p> <p>"There should be no less than four regions in order to maintain accessibility to lowans in need of service and ensure that Title I is used to concentrate on the employment needs in all parts of Iowa. Regions must be formed so that each area includes a mix of educational and training centers. One certified One Stop per region is not adequate if there are less than four regions."</p> <p>- Eugene Rome, Region 9 Regional Workforce Development Board Member</p> <p>"I see nothing in the proposal that indicates how this "realignment" will improve services to unemployed/dislocated lowans.</p> <p>"I am very concerned that our local workforce issues/needs will be lost when we are grouped into a large region with different challenges and employment base.</p> <p>"I fail to understand how adding a "governance coordinator" position in Des Moines will get more \$\$ to those in need, seems like yet another needless layer of government.</p> <p>"There is no substitute for face to face discussion of issues. The logistic challenges of larger regions will be huge, I doubt we will get the volunteer participation we have today. This will diminish the effectiveness of our local efforts to help people access needed training and find meaningful employment. "This push to another layer of consolidation is contrary to Iowa's home rule philosophy. We will take an already difficult to maneuver process and make it more challenging for the job seekers. "</p> <p>- Jeff Sorenson, Region 9 CEO, Muscatine County</p> <p>"It is imperative that the local funding formula remain in fact moving forward. Local areas should continue to receive allocations based on the formula, despite a decrease in the number of regions. The formula is designed to target dollars where they are most needed and align with population and local workforce needs. Our region is committed to serving customers, and meeting local workforce needs. In order to do this, we must have consistent and equitable funding. "</p> <p>- John J. Willey, CEO Chair, Region 9, Jackson County</p>
<p>5/3/18 John J. Willey</p>	<p>It is my understanding that the number of IVD regions could be reduced from the current fifteen (15) to only two (2) regions statewide. In my opinion, this would be a tremendous mistake. There are tremendous differences across the state, not only in workforce needs, but also population centers.</p> <p>Regionalization seems to be the key word for many of our services in Iowa, for example mental health and services for seniors. And, now, we look at reducing the number of regions providing services to our citizens in need of the variety of opportunities provided at our Davenport WIOA office.</p> <p>Finances are always a major part of making decisions and, with the current funding streams, I can understand the need for a reduction from the current fifteen (15) regions. I believe there should be a minimum of four (4) regions but six (6) would be preferable.</p> <p>Accessibility also plays a role in my recommendation. Although Iowa is not the biggest state in the union, traveling for needed services is yet another obstacle for our citizens who are already struggling. I understand that the rules would require only a single "One-Stop Center" per region. That does not seem very realistic, especially with only two (2) regions.</p> <p>Region 9 does a great job of serving the needs in our area. We have a history with our workforce training partnerships, which are essential in serving this population. These programs can only be accomplished if the funding formula is adequate to carry on the WIOA mission.</p> <p>We need to maintain opportunities in the rural areas of Iowa. They need to be available to all lowans.</p> <p>I have served on the Region 9 Workforce Board for over twelve (12) years and have witnessed the dedication of the staff and the board. When you consider the fact that board members volunteer the time and expense to attend the local meetings, I am concerned that the additional travel distance would have a detrimental effect on participation on the Regional boards or an advisory board.</p> <p>Thank you for taking the time to review my thoughts. My fellow Jackson County Supervisors agree with my message to those who will ultimately make this extremely important decision.</p>
<p>5/4/18 Ken Beck</p>	<p>As I understand, it is reasonable to reduce the regions done to 4 or 5; with just 2 regions, many areas will be underserved.</p>

Region 9	Questions / Comments
	<p>It is utmost important that the funding obtained by the current formula be retained and those funds funneled down to the local programs and clients. Keeping the regions as small as possible will assist in this request as well as better serve our local clients.</p> <p>In closing, please keep the number of regions to at least 4 to 5, and insure that the funding continues to our local Title I program to help those that the most help finding employment.</p>
<p>5/4/18 Scott County Board of Supervisors</p>	<p>The Scott County Board of Supervisors has been made aware of The Department of Labor’s review of Iowa Workforce Development (IWD). We understand the impact of the findings related to Title I – Workforce Innovation and Opportunity Act (WIOA), including the recommendation to move from 15 regions across the state to two regions. If the State of Iowa is forced to realign to two workforce regions it would leave Iowa with the fewest workforce regions of any mid-west state. We feel it is important to maintain local interest and control in these issues.</p> <p>Local WIOA and workforce training program partnerships are essential to serve the Scott County population. Local boards serve the purpose of representing the labor shed and having manageable areas for these partnerships is critical. As the State of Iowa works to reach the Future Ready Iowa goal by 2025 it is essential to have local partnerships. If a larger region is created, these partnerships will suffer making it difficult to align the labor shed areas and serve our citizens.</p> <p>We want to encourage any future regions be as small as possible to ensure that job seekers in Scott County are served in the best way possible. We would like to see that the current Title I formula be retained and used to carry funds to local programs and local customers with local priorities. We would like to be assured that Scott County’s most at risk and vulnerable citizens will not be left without support.</p>
<p>5/10/18 Gerald C. Smith</p>	<p>This letter is in support of the many letters, comments and concerns expressed by our partnered counties that make up Region 9 (Clinton, Jackson, Muscatine, and Scott) as it relates to the proposed reduction of the number of regions, the consolidation of other regions, and the centralization of policy decisions outside of our respective regions. Again, I concur with the conclusion that such an expansion would only dilute the synergies and collaborative nature of those who currently make up region 9’s present membership.</p> <p>Additionally, I also share in the belief that by expanding the current Board to include the proposed consolidation of additional counties, the synergies and collaborative energies that presently exist under the current system will be supplanted with political positioning and maneuvering thereby resulting in a loss of the very collaborative spirit, the vested trust, and the working environment we have long worked to build and maintain.</p> <p>We ask that you genuinely take these concerns into consideration when making your decision to fix what we firmly believe isn’t broke but works to the mutual benefit of all of our partners in Region 9, and I suspect throughout the entire system as well.</p>

REGION 10

Region 10	Questions / Comments
<p>4/26/18 Julie Perez</p>	<p>I’m a long time member of the Region 10 Workforce Development Board. I’m writing to encourage you to conduct more research and gather more input on the topic of the region structure. Specifically, I have concerns about moving forward with a two region plan for our state. This proposal does not seem to align with Governor Reynold’s top legislative priority of upgrading Iowan’s workforce skills. There seem be to a significant number of unanswered questions regarding how adequate services can be provided with only two regions. Those questions should be addressed before a decision is made.</p>
<p>5/1/18 Marcel Kielkucki</p>	<p>Dear members of the State Workforce Board,</p> <p>Thank you for your work and efforts to help Iowa become compliant with the rules and regulations of WIOA. As the director of the adult education/Title II programs in Region 10, as well as a regional workforce board member since 2011, I want to express my concerns with the proposed plan to realign Iowa’s workforce regions from the current 15 to 2 regions.</p> <p>While I work in Region 10, I live in Region 1 and I can attest that the needs of residents in Region 1 do not mirror those in Region 10. The shifting demographics of our state vary by region. In Region 10, we have a growing non-native English speaking population in need of growing service to meet our workforce demands. While growing immigrant and refugee populations are present across in the state, they are not at the same proportionality region by region.</p> <p>Likewise, the needs of employers vary across the state. While we have common economic sectors, the prevalence of these sectors change from region to region. Trying to bring together the state into two regions that stretch from Minnesota to Missouri inaccurately reflects the workforce needs of Iowans living in those regions. This will impact the ability of WIOA partners to effectively provide needed services as our labor market continues to exhibit needs and challenges.</p> <p>I understand the need to reduce from our current 15 region structure, as 15 regions are not sustainable given the limited resources we receive for WIOA administration. Changes are needed and necessary to help the workforce boards and core partners become compliant with WIOA and to deliver services more effectively. However, I do believe there is adequate funding available for more than two regions, with the potential for 4 or 5 regions across the state.</p>

Region 10	Questions / Comments
	<p>A hallmark of Iowa's governance structures is our emphasis on local control. As Iowans, we believe that the best decisions are made by those closest to the people, and that we provide the best services to our citizens when those services are designed and delivered on a local level. The proposed realignment to two workforce regions in Iowa will diminish the ability of our workforce system and its partners to deliver services effectively based on regional workforce needs. Realignment maintaining the greatest number of regions possible will more accurately reflect local needs and provide better services to our citizens. I strongly encourage the workforce board to consider alternative options to the current two-region plan.</p>
<p>5/4/18 Carla Andorf</p>	<p>State Workforce Development Board, I wanted to share some of my thoughts and feedback with you through the public comments option regarding the realignment process taking place in Iowa. I do see the need to re-evaluate regional boundaries, budgets and the roles/costs of board support, fiscal agent and the one-stop operator. The additional administrative cost to incorporate those three items into our WIOA system in Iowa will require additional funding, meaning regional boundaries may need to adjust.</p> <p>Based upon the information sent out for review from the State Workforce Board in March, and from information learned from the last realignment work group committee meeting, I have several comments for consideration as you continue your work to determine what regions, region size, budgets and one-stop office configurations are going to be best for Iowans, and what regional boundaries can still best serve businesses within labor shed areas.</p> <p>Below are some public comments, concerns and questions I have for the board to consider. In addition, you will find a document attached with some additional options to consider. I believe a 2 region approach, which the subcommittee recommended during a previous meeting, will not be in the best interest of Iowans. It would open the state up to closing many offices, and the regions would not align with labor shed areas and would include so many partners that collaboration may be impacted. It is also not in line with the number of regions other states of similar and small size have implemented. I have also attached a document to be included in my public comments that outlines a few different options for regional size and boundaries. I would recommend the 6 region map as I believe this aligns quite well with local labor shed areas and is a reasonable size to allow stronger partnerships and consistency across the region. It also will preserve at least 6 offices across the state, whereas 2 regions could potentially lead to 2 offices. As a reminder satellite and other offices are not required. I also think a 5 or 4 region map may work and could be considered. WIOA Titles 1, 2, 3 and 4 are required to cover infrastructure costs associated with the region which includes board support and the one stop operator. Recent DOL grant releases require applicants to show how they are covering infrastructure costs. There will not be an option to say that programs do not have funds, such as what Titles 2, 3 and 4 have done.</p> <p>If you have any questions, feel free to contact me. My signature line with contact information is at the bottom of this email.</p> <ul style="list-style-type: none"> • 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). How will Iowa remain compliant 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 leave Iowa with the fewest workforce 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. • DOL requires all partners who participate in the workforce system to contribute to infrastructure costs which can include one stop operator and board support. 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

Region 10	Questions / Comments
	<p>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?</p> <ul style="list-style-type: none"> • The initial draft budget for WIOA Title I services has been released and the state of Iowa is choosing to set aside the full amount allowable under federal law. 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. Other offices would be considered affiliate offices and have their own set of requirements as to which partners need to be present for it to even be an affiliate center. How will the decision be made as to which centers will be kept as the comprehensive American Job center one stops? • Training and Employment Guidance Letters (TEGL) 16-16 emphasizes that all one stop partners are required, under WIOA sec. 121 (h), to support the infrastructure costs 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 one stop operator's role within the one-stop center. The minimum requirement is for the operator to coordinate the service delivery 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, 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 actually a program and not an administrative function. 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- me position at \$100,000.

REGION 11

Region 11	Questions / Comments
<p>3/15/18 Rick Sanders</p>	<p>On behalf of the Region 11 Chief Elected Official (CEO) Board, I am writing you regarding the realignment plan for the local workforce development board areas. Our Board recognizes the need to restructure and reduce the number of regions. There are some of areas of questions and concerns that Region 11 CEO Board has about determining the new regions and ensuring services to the residents of Iowa.</p> <p>From a budgetary standpoint, the estimated costs for the board expenses do not take into consideration any variation of costs for regions of different sizes. Won't smaller rural regions be able to share an executive director with another region? The suggestion of sharing board staff between regions was once proposed by IWD as an option for Region 11. Also, how would the creation of regions be affected if funding, private and public, other than Title I administrative dollars was used to support the local workforce development boards? From an administrative perspective, the projection of expenses shows \$100,000 of administrative costs for service providers. If the local board became the grant recipient, wouldn't the service providers become sub-recipients with all their expenses being considered as program costs? Is the \$100,000 administrative funds for service providers an applicable board cost?</p> <p>Additionally, the Region 11 CEO board has definite concerns on how the following issues will be resolved.</p> <ul style="list-style-type: none"> • Having a large number of counties in a region is definitely concerning, particularly in the rural areas. How will the State of Iowa ensure that local voices are being heard? How will the State of Iowa ensure the quality workforce services are provided to rural lowans? • With the requirement of only having one one-stop center per region, how will IWD guarantee that the affiliate locations will have the services they need, particularly with more than one larger metropolitan in the region? • While information has been shared to the local workforce development boards and the CEO boards, how are these organizations going to be consulted as outlined in 20 CFR 679.210? <p>The Region 11 CEO Board looks forward to receiving a response from Realignment Committee to address our questions and concerns. Please do not hesitate to contact me at 515-382-7200 if you have any questions. Thank you for the committee's work on this critical issue that will have a long-term impact on Iowa's workforce.</p>

Region 11	Questions / Comments
<p>5/3/18 Paul Smith</p>	<p>I am writing to share my thoughts on the realignment topic. I am a business community representative to the Central Iowa Workforce Development Board. I also have the honor of serving as Chairperson of the CIWDB's Planning & Operations committee. But my first and foremost concern simply is for those seeking access to Iowa's workforce.</p> <p>The construction industry in which I work is one that has both 'walk on' jobs and skilled labor needs. Some of this is addressed through the labor unions who do an effectively job of providing skills training for those who sign-up for apprenticeship programs. However, we also have a great many roles that are not union labor workers on specific job sites – and yet we have just as much need for competent, skilled workers to fill those roles, as well. That is where my passion for the efforts of IWD is based: helping those who wish to seek gainful employment in a career path that provides a true livable wage be able to qualify for such jobs.</p> <p>While I know that the leadership of IWD, the State Board, and the members of the realignment task force would all say they share this view – one of the key elements to support that is the ability of individuals to access the services. While it is true that a great many services can be made available virtually through internet portals (for those individuals who are computer competent), there are just as many services which require a much more personal, human dynamic. My concern is that a reduction in the number of Iowa's regions will be a gateway to the eventual closing of even more One Stop Center locations. This is something that I believe would be a tremendous error in judgment.</p> <p>Let me pause to say that I support the reduction in regions. I recognize that the State cannot just print money (like their Federal level counterparts can). So either taxes have to go up or expenses have to go do – and often some combination of the two may take place. I also understand that Region 11's model of a FTE position of Executive Director is something that IWD would like to see replicated across the state; but there would be no way to provide funding for 15 such roles. Because I firmly believe that model really is the best approach, I am supportive of regional reductions to help make that vision a reality.</p> <p>However, the notion of reducing to just (2) regions is a concept destined for failure at the administrative and funding end, as well as a failure at the end-user experience end. I would like to state my support for either the "5 Areas" proposed model or the "4 Areas – Map B" proposed model. My rationale for choosing these models is because I believe they move to a more compressed structure that IWD is seeking, and yet ensure maximum local control based on true regional matters. There is no cookie-cutter policy or approach toward workforce issues that truly works statewide. Iowa truly can be divided up into these regions based upon the type of industry that is found in each of them. Allowing that to be one of the driving factors in determining the quantity would be wise for both IWD and those seeking assistance.</p> <p>But even beyond the number of regions selected, I implore IWD to provide a guarantee that no current One Stop locations will be considered for closing for at least 5-years following the full implementation of the new map. It will take at least that long for the full impact of regional reductions to truly be felt, and at that time it would be appropriate to entertain if any such changes would be warranted. However, it may also be that by that time we will find that additional One Stops may actually need to be added, too. Regional demands for service should drive those choices.</p> <p>I have also heard that one is opinion is that the IWD Director should have full authority to decide whether to close One Stop locations in any of the regions. This not only concerns from a potential abuse of power (if we have an IWD Director who is not as solid as Director Townsend) but also from a lack of representation perspective. The CIWDB Planning & Operations committee did vote unanimously to recommend that any such decisions should be made by the State Board, not just by the IWD Director. Additionally, any such decision should require the input and approval of the Board in the Region(s) impacted. Oh I know there will be an assumption that they would resist any such moves – but realistically, if the RWB members cannot be convinced that any such One Stop reductions would be a good choice then that really should be a huge red flag for those determined to proceed.</p> <p>Thank you for giving this opportunity for us to weigh-in. In summary I want to again applaud IWD for taking on the difficult task of revitalizing our regional structure. But I strongly request that any determinations or decisions not be based solely on the financial dynamics. We all know that, if those controlling the purse strings in the Legislature can be convinced to do so there can be additional funds made available. Rather than attempting to see just how 'cheap' we can run the system, the emphasis needs to be on how lean can the system run while still fulfilling its obligation to help the unemployed, underemployed, and disenfranchised members of our workforce. And then convincing the Legislature to fund such a program. I am more than happy to led my voice to any such effort.</p>

REGION 12

Region 12	Questions / Comments
<p>3/28/18 Bridget Hoefling</p>	<p>As Chairman of the Regional Workforce Development, the board has established some things that are most important to them for the Regional Alignment Process. The following are the top items that they feel are very important:</p> <ol style="list-style-type: none"> 1. Geography 2. That all end users are well served

Region 12	Questions / Comments
	<p>3. Customer Service is a must 4. Access to the Education Partners</p> <p>After establishing the most important items for the Regional Alignment Process, the board had, some key questions that they would like answered. If after I receive the answers, they have more questions, they would like for Ben Humphrey or yourself to come to a special meeting the board has said they would like to hold. The dates that I have been informed of that could be available are 3/29/18, 4/5/18, 4/19/18. Please let me know if those dates are still available or if a phone conference would be an option as well. The Boards did vote on for the 8 regions at this time or after the boards get their questions answered/or after the meeting.</p> <p>1. Where does the data come from that has been developed to establish the regions in the maps? Example, does this information come from census? Usage of the One Stops? Unemployment ratings? Also, how old is the data being used?</p> <p>2. How did they figure the % of what each region would be receiving in funds if the regions were divided as suggested?</p> <p>3. What would the composition of the new board? Such as, Labor vs business owners, Democrat vs Republican, Male vs Female</p> <p>4. What would the board look like as far as clarifying our voice? Would we be like an advisory board?</p> <p>5. How did they come up with the lay out of the different maps? What was the criteria used?</p>
4/30/18 Judy Peterson	My preference would be Six Regions or Five Regions Option A (on the maps just sent).
5/4/18 Mary Tyler	<p>After careful review of the information given and contemplating what would be best for the citizens of Iowa in regards to reorganizing districts, I would like to respectfully offer my opinion.</p> <p>I have seen firsthand how services for lowans in northwest Iowa were made more difficult to be received with the reduction of office locations several years ago when county offices were eliminated. Citizens from the Storm Lake area had to travel to Fort Dodge to receive assistance. Citizens from Cherokee had to drive to Sioux City. Goodwill Connection centers have tried to fill the gap. Reducing the regions will retain services in metro areas and these folks will not feel a difference but those who live outside of Ames, Des Moines, Sioux City, Davenport, Iowa City, and Cedar Rapids will continue to see reductions in availability of services. A drive of 45 to 60 minutes for someone whose resources are compromised means they don't receive services.</p> <p>Reduction to just a few regions doles responsibility out to subcommittee. These employees will have heavy responsibilities and no real power to make changes or decisions that would best suit their area, thus making them ineffective.</p> <p>Servicing our lowans needs to be our first responsibility. Therefore, I would like to see a conservative approach taken to reduce from 12 regions to 8 regions. I believe this issue can be revisited in 10 years. If further reductions are needed, it can be looked at again. Keeping regions as small as possible is the best option to allow our citizens to receive the services that are needed.</p> <p>Iowa has received positive press regarding our forward focus. Let's not undo the progress our state is making toward a robust future.</p>

REGION 13

Region 13	Questions / Comments
4/23/18 Kim Naven Gee	<p>To the WIOA Realignment Committee,</p> <p>Local input is so very critical to what works in Iowa. It brings jobs training to those who are not in metropolitan areas. Those that are literally and figuratively on the fringe.</p> <p>The realignment ideas that are proposed for the State of Iowa to be compliant with the DOL seems to take everything into consideration that the DOL wants/mandates and leaves the regional areas hollowed out.</p> <p>The DOL thinks that Iowa has been doing it 'wrong' but I would argue that we are doing things right. What works in DC, Chicago, LA and the likes doesn't work in rural-centric Iowa.</p> <p>The option that was discussed at our RWDB Region 13 meeting was to keep the regions at a minimum 5. Looking at you're figures on the interactive map would put overall administrative costs at the lowest: \$835,000 – based on \$167K times 5 regions. The realignment maps that favor 2 or 3 regions are unacceptable due to the obvious...no local input. But administrative costs are either \$1,040,000/\$894,000 depending on map. Plus, that scenario is throwing the rural parts of the state under the bus. The people who it need it the most will not be served in a practical way.</p> <p>We all understand that the Feds hold the purse strings, but it is utmost overreach for them to tell the State of Iowa how to administer real funds to pay for administrative positions that do not create new jobs for lowans.</p>

Region 13	Questions / Comments
	<p>What I fear is that the DOL is requiring this realignment but for what end? Has Iowa not been on the forefront of jobs training? Has the State of Iowa been fiscally irresponsible? If we have been fiscally responsible and have created job opportunities? Then I cannot fathom why the Fed's way is better. Other than control.</p> <p>I thank you for this opportunity to express my opinion (and it is my opinion not a Board opinion) on the realignment of the RWDB in Iowa.</p>

REGION 14

Region 14	Questions / Comments
<p>4/10/18 Dennis Brown</p>	<p>I have attended several meetings regarding the proposed realignment of Iowa's local areas, and studied the various options. While understanding the need to economize, I have yet to see a plan that will do so, while still fulfilling the aims of our local development board in a satisfactory manner. Greatly reducing the number of areas will inevitably place the metropolitan areas in with those from rural Iowa, resulting in a lack of attention to the less populated parts of the state. Our services will suffer as a result. It's in the interest of all to combine the "like" areas to ensure that every part of Iowa is treated equitably. Efficiencies can be realized without sacrificing results. Our local Area 14 is performing admirably, and I believe I can safely say that the entire state can learn from us. Thank you for giving me the opportunity to voice my concerns about this process.</p>
<p>4/23/18 Charles Ambrose</p>	<p>With regard to findings presented to Iowa Workforce Development on November 8, 2017, the attached document is a proposal from Region 14 CEOs as an alternative consolidation plan. Iowa has long been praised for their workforce development system and is a guiding platform for WIOA legislation. Iowa CEOs know local control of resources contribute to service delivery success. We ask the Realignment Committee and State of Iowa Workforce Board continue to support local control. The proposed system will distribute shared costs and maintain operations of local offices.</p> <p>The Proposed plan allows for the creation of new boards to adhere required functions of WIOA. It also allows Title I funding to remain at current funding levels with Workforce Districts and existing partnerships that have served the local participants for decades. It consolidates the financial responsibility and eliminates the grant from being distributed among multiple providers. This plan would allow regions across the state to capture local level best practices and duplicate success across the State. Sharing of success is the reason Iowa is considered by the Secretary of Labor and Iowa Workforce Development Director as the model for workforce delivery throughout the country.</p> <p>Our Proposed Plan allows the two most rural regions (Southern and North West) the ability to share the cost of One-Stop Operator. In the Iowa Workforce Development information released, the base cost for an employee for the Central District is \$100,000. Using that as the sample and using sample Data provided by the Census Bureau on Median incomes the CEO's have calculated new reasonable salary costs for each proposed district.</p> <p>We have attached a narrative of our proposal accompanied by a map outlining new proposed Districts and tables defining proposed modified costs. We ask you consider our proposal as a viable alternative to the State Proposed Plan. If you have, questions please feel free to contact the CEO Board to schedule a conference. We believe this plan will work and allow us to continue to serve Iowa with the integrity we have developed through years of commitment.</p>

REGION 15

Region 15	Questions / Comments
<p>5/1/18 David Krutzfeldt and Matt Greiner</p>	<p>The Region 15 Regional Workforce Development Board (the Board) and the Chief Elected Official (CEO) Board understands that the U.S. Department of Labor (DOL) has imposed requirements on Iowa Workforce Development (IWD) and that there are concerns about "stretching the available dollars so thin that the local areas are unable to fund core WIOA functions ... " However, the Board is concerned that the future of our businesses, employees, and local economy is in jeopardy if the proposed plans move forward unchanged. The Board provides the following comments regarding the State of Iowa Realignment of WIOA Regions:</p>

Region 15	Questions / Comments
	<p>1. The State Workforce Development Board's Realignment Committee established a framework for realignment that included three points. One of these was to maintain local input by establishing local advisory committees in place of the current 15 local boards. It's unrealistic to expect that present board members, who will be stripped of their ability to make decisions that can impact their local area, will remain active and committed when they know they have no power to affect outcomes. Particularly, when they will no longer be appointed by the Governor. Additionally, the word "oversight" has been used in the documentation in relationship to the Advisory Committee's duties. Could you provide a description of the proposed responsibilities that the Advisory Committees will have?</p> <p>2. After review of the One Stop Operator and Local Board Support position job duties, the Board determined that the salaries seemed excessive. Could you provide the full Job descriptions for these two positions?</p> <p>3. As a suggestion, the Board wondered whether given fiscal budgetary concerns and the frequency of local board meetings, can the Local Board Support and One Stop Operator to be shared between Regions?</p> <p>4. Although there are no plans to close workforce offices presently, once the realignment is complete, the state could close offices given that federal law requires only 1 one-stop office per region. Because 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?</p> <p>5. The WIOA legislation requires workforce regions be consistent with local labor shed areas, and have a common economic development area (TEGL 27-14). How will Iowa remain compliant 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?</p> <p>6. DOL requires all partners who participate in the workforce system to contribute to costs which include one stop operator and board support. How can WIOA Title 2, 3 and 4 state they have no funds to contribute to these costs? That does not align with DOL requirements. Additionally, recent DOL grants require partners to contribute to the cost of the One Stop Operator and Local Board Support. Will DOL be asking how, or requiring Titles 2, 3 and 4 to demonstrate how, they are contributing to these costs? We believe this cost sharing should be developed now to head off issues later with future DOL monitoring?</p> <p>7. The initial draft budget for WIOA Title I services has been released and the state of Iowa is choosing to set aside the full amount allowable under federal law. 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 Dislocated Worker rapid response meetings? We recommend to use a portion of those funds to support the cost of WIOA administrative requirements.</p> <p>8. Given that the Local Boards have significant experience; the Board asks that they have the opportunity to cast a nonbinding vote on the Realignment Committees final recommendation prior to it going to the State Board for vote.</p> <p>The Board sincerely wishes to work with IVD and Director Townsend to reach solutions to the difficult challenges ahead. We are open to any collaborative efforts. If you have any questions, please contact Jennifer Erdmann at (641) 684-5401 Ext 40042.</p>