



February 18, 2020

As required by law, the Georgia Unified State Plan was posted for public comment for thirty (30) days between January 17, 2020 and February 17, 2020. The following details the public comments received and the State's responses and/or revisions to the Plan based upon this feedback.

Two commenters voiced support for the submission of a Combined State Plan, and requested an explanation for why the State chose a Unified Plan instead.

In drafting the State Plan, the core partners utilize the guidance issued by USDOL to address all required elements. An explanation of why a State elected to develop a Unified or Combined Plan is not required, and is typically not included in the plan. Although Georgia has chosen a Unified State Plan, partnerships with non-core partners are included in the State's four-year strategy. In fact, throughout the plan there are references to many other agencies and organizations with which the workforce system is engaging that are outside of the core required partners. For example, the State is in the early stages of discussions with TANF and SNAP regarding integration of services and strategies to help Georgians across the state. However, the State chose not to include them as a formal partner in the Plan as inclusion would require them to be subject to the common planning elements. As these discussions are still in the early planning phases, including descriptions of specific strategies and progress in data collection and reporting systems is premature. Additionally, OWD is currently partnering with the Georgia Department of Education on evaluating and improving their credentials of value in CTAE programs. Furthermore, the State plans to pursue additional opportunities to partner with Perkins in the coming years. Ultimately, based on timing of plan submission deadlines and the lead time necessary for establishing true alignment with non-core partners, the State chose a Unified Plan. In future, Georgia plans to submit a Combined Plan and strives to increase integration with other non-core partners; but at the time of drafting the 2020 plan, those goals are not yet realized.

Two commenters voiced support for establishing performance targets that improve equity by disaggregating data to develop targeted strategies for priority populations and minorities, and the development of state-wide data sharing agreements to collect information about participants through the state's wage record database and use of the Georgia AWARDS longitudinal data system.

The State intends to pursue better methods for disaggregating data related to minority populations, in order to develop targeted strategies for serving priority groups that may require a more tailored approach to training and placement. With regard to state-wide data sharing agreements, OWD has had preliminary discussions with TANF and SNAP partners to establish these agreements. However, these discussions are still in early phases and did not yet warrant inclusion in the State Plan.



Two commenters voiced support for the State to require Local Workforce Development Boards to establish youth committees.

While WIOA does not require that LWDBs maintain a standing youth committee, as was required under WIA, fifteen of Georgia's nineteen LWDBs currently have such a committee. LWDBs are evaluated every other year to ensure compliance with federally-mandated composition requirements, open meeting requirements, in addition to compliant and effective bylaws and standing committee structure. In order to consider differences in LWDBs across the state and their current capacity to address youth issues, the State plans to offer targeted technical assistance to those four areas without a youth committee, prior to making this issue a matter of policy. OWD's Strategic Populations Team will continue working with LWDBs to improve youth service delivery, which includes encouraging the establishment of and engagement with the LWDB's youth committee.

Two commenters voiced support for making job quality a priority in employer eligibility for work-based training opportunities, such as On-the-Job Training and Incumbent Worker Training. These commenters voiced support for including eligibility criteria for livable wages, paid family leave, and predictable scheduling.

The State recognizes the importance of high-quality work-based learning programs that lead to participants receiving an industry-recognized credential, a stable and sustainable living wage, sufficient benefits offerings, and manageable work demands and environment. The State encourages working through career pathways, especially for priority populations like individuals with disabilities, individuals experiencing homelessness, and individuals transitioning from the justice system. While entry-level jobs might not be the end goal, they are a necessary first step for many when beginning their journey toward self-sufficiency. Therefore, the State continues to encourage LWDBs to strongly consider these factors when deciding which programs to fund and approve. The companies providing the best outcomes for their new or existing employees should take priority in receiving funding.

One commenter voiced support for SB 354 to support low-income student parents.

OWD will work with partner agencies to enact any state legislation that overlaps with the work of the workforce system.

Two commenters inquired about the data sources for the regional sector job openings. These commenters stated that the data and narrative did not fully capture the needs of Region 6 (Macon/Middle Georgia).

The State understands that the completeness of employment and demand data within some sectors can lead to challenges when painting a state-wide picture. However, OWD will work with all local areas to accurately depict current trends and needs for the completion of local planning. Additionally, OWD is open to any additional data sources that can be used locally.



One commenter inquired about whether Adult Education services competitively procured.

Per WIOA Section 231(a), states must award multiyear grants, on a competitive basis, to eligible providers to develop, implement, and improve adult education and literacy activities within the state. Georgia recently released its [Request for Application](#) for adult education providers. The awarded grants will last for four years (July 2020 – June 2024), contingent upon an annual renewal process.