



**Comments
On
Title I
Workforce Innovation and Opportunity Act NPRMs
RIN 1205-AB73**

The Illinois Community College Board appreciates the opportunity to comment on The Joint Rule proposals in the WIOA regulations. These comments are based on Regional Sessions held in the state with Adult Education, Career & Technical Education, and Community College representatives. In addition, some of the comments are also based on comments from the National Council of State Directors of Adult Education (NCSDAE).

The Illinois Community College Board is also grateful for the opportunity to provide feedback on the proposed regulations to implement the Workforce Innovation and Opportunity Act of 2014. As the member of the State of Illinois' WIOA Implementation Interagency Working Group responsible for programs under **Title II –Adult Education and Literacy (AEL) Act** of WIOA, we are pleased to submit the comments below on behalf of our partners.

The information below cites specific comments on The Joint Rule, NPRM - **RIN 1205-AB73** proposal.

**WIOA –Title I
RIN 1205-AB73**

679.320

With regard to 679.320, and the membership of local workforce development boards, we request the elimination of subparagraph (h), which allows for representation of multiple entities. The reasoning for this request is twofold: first, multiple representation does not ensure that each of the entities is fully and faithfully represented, particularly if the representative is not fully versed in the needs of one or another entity; second, the text of WIOA does not include a provision allowing for multiple representation. While not expressly disallowed, we believe that the spirit of the law intends to allow for equal and individual representation by each entity. We believe that each of the individual core programs needs to be required to have separate representation to ensure adequate participation.

- We request that 679.320(d) (2) be amended thusly: “At least one representative from an institution of higher education providing workforce investment activities, specifically the President/CEO, or designee, of a community college;”.
- We request that 679.320(d) also be amended to add an additional item: “(4) At least one eligible provider administering Postsecondary Perkins Career & Technical Education:” The reason for this request is to account for the fact that Postsecondary Perkins CTE (a required one-stop partner) has a vast number of programs which individuals will utilize for technical training and these programs count for a large proportion of the ETPL.
- We request that 679.320(d)(1) be amended thusly: “At least one eligible provider with direct responsibility for administering adult education and literacy activities under WIOA title II;”

- We request that 679.320(g)(3) be amended thusly: “When there is more than one local area provider of adult education and literacy activities under Title II, or multiple institutions of higher education providing workforce investment activities as described in WIOA 107(b)(2)(C)(i) or (ii), the Title II eligible state agency will determine the process for selection of local representation.”

680.530

- With regard to 680.530 and eligible training providers (ETP), we request that the citation be amended to include language that ensures that non-credit training and education be included on the Eligible Training Provider List (ETPL).
- We also request that because community colleges make up such a substantial portion of the ETPL, performance-related elements for providers is consistent across all eligible training providers, to ensure better program outcomes. A level playing field is needed between all ETPs.

680.600

- With regard to 680.600(a), we request the citation be amended to include language that specifies that all core partners will adhere to the requirements provided to ensure that the lowest skilled adults are served.

680.700

- With regard to 680.700, we request the citation to be amended to include work-based learning activities that are identified and linked to training provided by ETPs.

680.790

- With regard to 680.790 and the definition of “incumbent worker training”, we request clarification on whether this allows for contracted training through business and industry, adult education, etc.