

SOUTHWEST ARKANSAS WORKFORCE INVESTMENT BOARD
P.O. Box 767, 101 Business Park Drive
Magnolia, AR 71754
(870) 235-7510 Fax: (870) 234-0135

September 10, 2012

Ms. Cindy Varner, Assistant Director
Arkansas Department of Workforce Services
Office of Employment Assistance
Two Capitol Mall, Room 429
Little Rock, AR 72201

Dear Ms. Varner:

Thank you for the opportunity to review the proposed 2012-2016 State Integrated Workforce Plan prepared by the Arkansas Department of Workforce Services (DWS) and submitted for public review and comments on August 13, 2012. The Southwest Arkansas Workforce Investment Area offers the following comments:

In regard to the Arkansas Workforce Investment Board Strategic Planning effort, the local workforce investment board is charged with the responsibility of collecting and compiling data for some components of the plan. While this information is necessary and critical for the success of the implementation of the plan, the local board does not have the staff or the resources to fulfill this requirement.

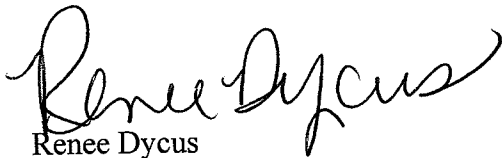
Currently, the Institute of Economic Advancement (IEA) and the 8 Planning and Development Districts (PDD's) are in the process of preparing a statewide comprehensive economic development strategy (CEDS) that is being funded by the Economic Development Administration (EDA). This statewide CEDS will include a workforce development component and will include much of the data that is being required within the matrix provided in your draft plan. Since one of the goals of the Integrated Workforce Plan is to reduce duplication, it is recommended that DWS partner with IEA and the 8 PDD's to provide the required information necessary for the preparation and implementation of the Integrated Workforce Plan.

Southwest Arkansas Planning and Development District (SWAPDD) and the Southwest Arkansas Workforce Investment Board (SAWIB) are committed to providing the necessary requirements to you through our statewide CEDS planning effort. Together, we can develop a strategic, comprehensive action plan to improve services to our job seekers and employers while

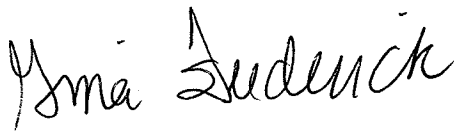
improving the efficiency of our agencies.

We look forward to a successful collaboration on this critical planning effort for our state.

Sincerely,

A handwritten signature in black ink, reading "Renee Dycus". The signature is fluid and cursive, with the first name "Renee" written in a larger, more prominent script than the last name "Dycus".

Renee Dycus
Executive Director

A handwritten signature in black ink, reading "Gina Frederick". The signature is written in a cursive style, with the first name "Gina" and last name "Frederick" clearly legible.

Gina Frederick, WAPDD
SWAWIB Staff



September 11, 2012

1500 MAIN • P.O. BOX 1266

VAN BUREN, ARKANSAS 72957

Cindy Varner, Assistant Director
Arkansas Department of Workforce Services
Office of Employment Assistance
Two Capitol Mall, Room 429
Little Rock, AR 72201

Dear Ms. Varner:

As the WIA Program Provider/One-stop Operator-Consortium Partner for Western Arkansas, Western Arkansas Employment Development Agency (WAEDA) has reviewed the proposed State Integrated Workforce Plan and is submitting this letter in response to your request for comments on the proposed plan.

In consensus with the other Workforce Investment Areas, we agree that although the basis of the plan is sound and provides the structure to fulfill the Governor's and the Arkansas Workforce Investment Board's vision, the sections of the plan requiring Local Workforce Investment Boards to function as economic development organizations would require professional expertise and funding levels that do not currently exist in the local workforce areas.

Therefore, WAEDA recommends that the economic development mandates for the Local Workforce Investment Boards in the proposed plan be replaced with an "affiliation/partnership agreement" with a local and/or regional economic development agency to obtain the desired economic development activities for the designated Workforce Area.

In addition, WAEDA recommends that the Arkansas Department of Workforce Services enlists a partnership with the Institute of Economic Advancement at the University of Arkansas at Little Rock's ongoing effort to accomplish the very economic development activities and goals that are outlined in the proposed plan - rather than require the Local Workforce Boards (which are underfunded *and* under staffed) to duplicate the efforts of IEA, which has been funded by the Economic Development Administration and which has the professional expertise required to successfully develop a "Comprehensive Economic Development Strategy".

This effort by IEA, is also supported by the eight Arkansas designated EDA funded Regional Planning and Development Districts, the Executive Directors of the Arkansas

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WESTERN ARKANSAS EMPLOYMENT DEVELOPMENT

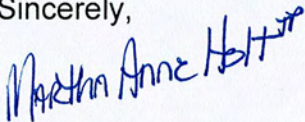
EQUAL OPPORTUNITY EMPLOYER

Municipal League, the Association of Arkansas Counties, the Arkansas Economic Development Commission and the Economic Developers of Arkansas. Also, a total of sixteen members of this task force are Chief Elected Officials from across the State, who participate directly in the governance of this process. Assistance and review will be provided through an additional review committee of 384 individuals selected from all fields of economic endeavor across the state.

The local Workforce Boards, and the State of Arkansas as a whole, would be better served to embrace and utilize the results of the IEA development process of a "Statewide Comprehensive Economic Development Strategy" rather than mandate each Local Workforce Investment Board to duplicate IEA's efforts on the local level.

Thank you for the opportunity to submit WAEDA's comments on the proposed State Integrated Workforce Plan.

Sincerely,

A handwritten signature in blue ink that reads "Martha Anne Holt". The signature is written in a cursive, flowing style.

Martha Anne Holt
WAEDA Administrator

September 11, 2012

Arkansas Department of Workforce Services
Office of Employment Assistance
ATTN: Cindy Varner, Assistant Director
P.O. Box 2981
Little Rock, AR 72203

Dear Ms. Varner:

The White River Planning and Development District (WRPDD), WIA fiscal/administrative agent, and Northcentral Arkansas Development Council (NADC), WIA Title I Service Provider/One-stop Operator, for the North Central Arkansas Workforce Investment Area hereby submit the following comments pertaining to the proposed State Integrated Workforce Plan for 2012-2016:

1. There are several objectives in the state plan which assign the responsibility of economic development to the Local Workforce Investment Boards (LWIBs). We feel this is unrealistic for the local board because it does not possess the required expertise and is not economically feasible due to its limited funding and staff.
2. The eight Development Districts of the Arkansas Association of Development Organizations (AADO) received an Economic Development Administration (EDA) grant and have contracted with the Institute for Economic Advancement through UALR to develop a statewide economic development strategy. The plan has two functions: 1) address statewide issues, challenges and opportunities by creating broad economic development strategies and 2) develop a web page which is geared toward economic development and workforce development to access statistical data for a targeted area. It would be a duplication of work if the LWIBs were required to undertake some of the work tasks and responsibilities outlined in the EDA work program. IEA staff possess the professional expertise and funding to develop and implement such strategies.
3. Since there is a statewide effort underway to develop a Comprehensive Economic Development Strategy through the EDA grant, we propose that the LWIB's role for these objectives be in the capacity of a partnership agreement with the local economic development organizations.

WRPDD and NADC hope that our comments and proposals are positively considered, and we thank you for providing us the opportunity to submit our comments on the State Plan.

Sincerely,

Van Thomas,
WRPDD Executive Director

Brad Cummings,
NADC Executive Director

Western Arkansas Planning & Development District Inc.



September 11, 2012

Arkansas Department of Workforce Services
Office of Employment Assistance
Two Capitol Mall, Room 429
Little Rock, AR 72201

ATTN: Cindy Varner, Assistant Director

Dear Ms. Varner:

The Western Arkansas Planning and Development District (WAPDD) has reviewed the proposed 2012-2016 State Integrated Workforce Plan that was submitted for public review and comments on August 13, 2012. This letter is submitted in response to your request for submission of "comments" on the proposed plan.

In review of the proposed plan, it is clear that the framework set forth in the plan has great potential to reshape Arkansas' workforce development system and help achieve the Governor's vision and goals outlined in the plan.

However, the requirements outlined in attachment "D" for the LWIA's requires professional expertise do not currently exist and are not affordable through the local workforce areas.

WAPDD recommends the "economic development" mandates for the Local Workforce Investment Boards in the proposed plan be replaced with a required "affiliation/partnership agreement" with a local and/or regional economic development agency to obtain the desired economic development activities for the designated Workforce Area.

In consideration of WIA's goal of reducing redundancy, WAPDD highly recommends that the Arkansas Workforce Investment Board forge a partnership with the ongoing efforts of the Institute of Economic Advancement at the University of Arkansas at Little Rock's ongoing effort to accomplish the very economic development activities and goals that are outlined in the proposed plan. Rather than require the Local Workforce Boards, which are underfunded and under staffed, to duplicate the efforts of IEA, which has been funded by the Economic Development Administration and which has the professional expertise required to successfully develop a "Comprehensive Economic Development Strategy."

This effort by IEA, is also supported by the eight Arkansas designated EDA funded Regional Planning and Development Districts, the Executive Directors of the Arkansas

Municipal League, the Association of Arkansas Counties, the Arkansas Economic Development Commission and the Economic Developers of Arkansas. Also, a total of sixteen members of this task force are "Chief Elected Officials" from across the State, which participates directly in the governance of this process. Assistance and review will be provided through an additional review committee of 384 individuals selected from all fields of economic endeavor across the state.

The Local Workforce Boards and the State of Arkansas as a whole would be better served to embrace and utilize the results of the IEA development process of a "Statewide Comprehensive Economic Development Strategy" rather than mandate each Local Workforce Board to duplicate IEA's efforts on the local level.

Thank you for the opportunity to submit WAPDD's comments on the proposed "2012-2016 State Integrated Workforce Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Chapple". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Tracy Chapple
WIA Administrator
Western Arkansas Planning & Development District, Inc.



West Central Arkansas Planning & Development District, Inc.

Dwayne Pratt
Executive Director

September 11, 2012

Ms. Cindy Varner, Assistant Director
Arkansas Department of Workforce Services
Office of Employment Assistance
Two Capitol Mall, Room 429
Little Rock, AR 72201

Dear Ms. Varner: *CINDY*

West Central Arkansas Planning and Development District (WCAPDD) has reviewed the proposed 2012-2016 State Integrated Workforce Plan that was submitted for public review and comments on August 13, 2012. As the Administrative Entity/Fiscal Agent of the West Central Arkansas Workforce Investment Area, we are submitting our comments on the proposed plan.

WCAPDD recommends that the Arkansas Department of Workforce Services work cooperatively with the Institute of Economic Advancement (IEA) at the University of Arkansas at Little Rock. The IEA, along with a majority of relevant economic development stakeholders and elected officials, currently has an ongoing effort to create a Statewide Comprehensive Economic Development Strategy, which takes into consideration the critical role of a properly trained and educated workforce that matches employer and industry needs. This process will engage the daily economic development practitioners and experts in the State to evaluate the most relevant workforce training needs of their private sector industries on a local level.

This effort by IEA and the State's eight EDA designated Planning/Economic Development Districts also includes the Executive Directors of the Arkansas Municipal League and Association of Arkansas Counties, Arkansas Economic Development Commission and the Economic Developers of Arkansas. Also, there are a total of sixteen members of this task force that are "Chief Elected Officials" from across the State participating the governance of this process.

Therefore, it is our opinion that this effort will achieve many of the goals noted in the proposed plan requirements to integrate DWS workforce issues and concerns within the broader statewide economic development activities. We are aware that there are some issues with the timing of the completion of the Statewide CEDS (scheduled for completion MAR 2014) and the DWS Statewide Workforce Plan. Therefore, we suggest the postponement of the proposed requirements of local WIB's to carry out the broader economic development related requirements until completion of the CEDS.

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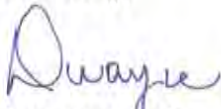
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Further, this approach would ensure that those economic development experts from across that State have had input into the process and will further your goal of ensuring that workforce training needs are a key consideration in the State's economic development goals and objectives.

Additionally, I am concerned with the ongoing financial constraints of the program that have resulted from declining funding in the Federal program. We maintain austere staffing levels to ensure that we can provide the maximum amount of assistance for actual education and training for clients. These additional requirements, which would have to be performed by WIB staff, would make it more difficult to ensure on-going compliance with all the program guidelines. Also, I am concerned that existing WIB staff does not have the expertise in economic development to adequately accomplish the proposed requirements. Another concern regarding the proposed new requirements is the fact that ultimately the local WIB members are responsible for ensuring compliance. Additional liability for issues over which members have little or no control may make it even more difficult to recruit and maintain local WIB members.

Thank you for giving WCAPDD the opportunity to comment on the proposed "2012-2016 State Integrated Workforce Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dwayne", with a stylized flourish at the end.

Dwayne Pratt
Executive Director



CENTRAL ARKANSAS

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September 10, 2012

Arkansas Department of Workforce Services
Office of Employment Assistance
Two Capitol Mall, Room 429
Little Rock, AR 72201

ATTN: Cindy Varner, Assistant Director

Dear Ms. Varner:

The Central Arkansas Planning and Development District (CAPDD) has reviewed the proposed 2012-2016 State Integrated Workforce Plan that was submitted for public review and comments on August 13, 2012. As the "One-stop Operator" for both the Central Arkansas Workforce Investment Area and the Southeast Arkansas Workforce Area, the letter is submitted in your request for submission of "comments" on the proposed plan.

CAPDD found the foundation of the plan to provide the required "Workforce Services" via the Arkansas Workforce Centers is very solid and will provide a framework to continuously improve the services available to the citizens and employers of our State.

However, the section of the plan requiring Local Workforce Boards to morph into "economic development organizations" is simply too broad an agenda and would require professional expertise that does not currently exist and which is not affordable through the local workforce areas.

Therefore, CAPDD recommends the "economic development" mandates for the Local Workforce Investment Boards in the proposed plan be replaced with a required "affiliation/partnership agreement" with a local and/or regional economic development agency to obtain the desired economic development activities for the designated Workforce Area.

In addition, CAPDD highly recommends that the Arkansas Department of Workforce Services enlists a partnership with the ongoing efforts of the Institute of Economic Advancement at the University of Arkansas at Little Rock's ongoing effort to accomplish the very economic development activities and goals that are outlined in the proposed plan. Rather than require the Local Workforce Boards, which are underfunded and under staffed, to duplicate the efforts of IEA, which has been funded by the Economic Development Administration and which has the professional expertise required to successfully develop a "Comprehensive Economic Development Strategy".

902 N. Center Street • P.O. Box 300 • Lonoke, Arkansas 72086

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This effort by IEA, is also supported by the eight Arkansas designated EDA funded Regional Planning and Development Districts, the Executive Directors of the Arkansas Municipal League, the Association of Arkansas Counties, the Arkansas Economic Development Commission and the Economic Developers of Arkansas. Also, a total of sixteen members of this task force are "Chief Elected Officials" from across the State, which participates directly in the governance of this process. Assistance and review will be provided through an additional review committee of 384 individuals selected from all fields of economic endeavor across the state.

The Local Workforce Boards and the State of Arkansas as a whole would be better served to embrace and utilize the results of the IEA development process of a "Statewide Comprehensive Economic Development Strategy" rather than mandate each Local Workforce Board to duplicate IEA's efforts on the local level.

Thank you for the opportunity to submit CAPDD's comments on the proposed "2012-2016 State Integrated Workforce Plan.

Sincerely,



Rodney Larsen
Executive Director