



January 19, 2016

Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for DOL-ETA
Office of Management and Budget
Room 10235
725 17th Street NW
Washington DC 20503

RE: Request for Comments on WIOA Unified and Combined State Plan Requirements
Docket No. ETA-2015-0001

To Whom It May Concern:

Workforce Solutions Borderplex is appreciative of the opportunity it has had as a Local workforce board to participate in the legislative process by providing input on the Workforce Innovation and Opportunity Act (WIOA). We submit these concerns in the best interest of the people we serve and the Texas Workforce System. We ask the Federal Government to take greater consideration toward Local boards in the State Plan requirements. In theory, the WIOA requirements for Unified and Combined State Plans are reasonable but in reality, the landscape of the United States is vast in variety. WIOA was enacted so that opportunities and jobs could grow nationally. For that come to fruition in five short years, the policy needs to be flexible enough to fit into the nooks and crannies of America- areas that State governments can easily overlook.

The Borderplex Region (El Paso, Texas and surrounding rural communities) is an example of where WIOA should enforce greater collaboration between State and local boards in the planning process. As stated in §3111(d)(8) *The State shall assist the Governor in the development of allocation formulas for the distribution of funds for employment and training activities for adults, and youth workforce investment activities to local areas [...]* However, these formulas tend to treat regional and local areas as being either urban or rural instead of a mixture of both.

El Paso, Texas has difficulty connecting with state government in the most literal sense of the term. The population of Texas is 26 million and 70% of those people live within 200 miles of the State Capital in Austin. Meanwhile, El Paso is just about as close to Austin as it is to the Grand Canyon (approximately

580 miles). Whereas, Texas represents 7.4% of the Nation's land area, the Borderplex Workforce Development Area represents 12.3% of Texas' land area at 21, 700 square miles. The Borderplex WDA is comprised of six counties: El Paso, Brewster, Culberson, Hudspeth, Jeff Davis and Presidio. The Workforce Solutions Borderplex main office is 234 miles away from our workforce center in Alpine, Texas. In the near four-hour drive to Alpine, elevations climb over 1-mile high and the time zone changes to from Mountain to Central shortly after El Paso County. The combined population of the Borderplex Rural Area (minus El Paso County) is approximately 24,000. Meanwhile, in January 2015 alone, nearly 51,000 people crossed the Stanton Street Pedestrian Bridge to/from Ciudad Juarez, Mexico to Downtown El Paso. The Borderplex is both Urban and Rural. As such, when the composition of the Borderplex is so different within itself, and from the rest of Texas, policies marked "No Local Flexibility" can be crippling if ill-fitted.

Therefore, Workforce Solutions Borderplex advocates that an additional factor be added for consideration of funding based on geographic barriers; such as, square miles in WDA, miles between participants and resources, and existing infrastructure in the rural areas. Furthermore, alternative funding allocations tend to be provided at the discretion of the State, such as, *§3163 Youth Discretionary Allocation* which gives the State an option for an alternative discretionary allocation in cases of *§3162(B)(1)(C)(i) I) excess youth poverty in urban, rural, and suburban local areas; and II) excess unemployment above State average in urban, rural, and suburban areas*. The adjustment is offered on discretionary basis and must be taken in lieu of the traditional allocation. The Borderplex meets both the excess youth poverty and unemployment criteria. In fact, but Presidio County's rate is consistently high-10.9% for December 2015. We advocate that local boards with areas consistently meeting these criteria be able to identify allocation adjustment zones in their local plans to be approved in an open and transparent manner.

Another alternative allocation approval that Workforce Solutions Borderplex would like to see expedited by the approval of the local plan is *§3151(4)(5)* allowing for the decrease in Out-of-School Priority to 50 percent after an analysis is conducted demonstrated a low number of OSY in a local area consistent with compulsory school attendance laws. This adjustment is much needed in our WDA for rural areas like Valentine High School in Valentine Township, Texas with a zero-percent dropout rate. These approvals can be reviewed on an annual basis along with the adoption of the annual budget. In cases like El Paso, where travel is expensive and time-intensive, it is easier on local budgets to consolidate legislative actions. Thus, time spent between state and local boards is focused and more productive. In result, connection takes place.

Again, Workforce Solutions Borderplex appreciates the opportunity to provide input on the Unified and Combined State Plan requirements. For regions like the Borderplex, these policy amendments would enable us to better work with the State of Texas to create workforce goals that are realistic, attainable, yet ambitious- ultimately pushing our entire Nation forward toward a brighter future.

Should you have any questions, please contact Shamori Whitt at Shamori.Whitt@borderplexjobs.com or at (915) 887-2432.