

**Author Full Name :** Georgia DCSS**Received Date :** 01/30/2025 10:55 AM**Comments Received :****Comment 1:**

Is the requirement for updating the State Plan for Employment and Training Services specific to Employment and Training Services that are funded by FFP only? Georgia's Employment and Training Program is currently funded with federal incentive funds and does not have any State Plan requirements. Does this requirement include programs funded with other sources of funding like Incentive funds or Section 1115 funding? The language in 45 CFR § 302.76 that says "If the State chooses this option..." seems to suggest that it is only for if IV-D agencies that wish to use FFP to fund their Employment and Training Program. However, there is also other language throughout the final rule that suggests the requirement is more of a general statement for than specific to a type of funding source.

**Comment 2:**

The requirement that the State Plan have an explanation regarding how each state has consulted with state agencies that administer a list of the following federal programs:

1. TANF.
2. SNAP Employment and Training program.
3. The Adult, Dislocated Worker, and Youth programs under title I of the Workforce Innovation and Opportunity Act.
4. The Adult Education and Family Literacy Act Program.
5. The Employment Service Program.
6. the Vocational Rehabilitation program; or
7. any other federally funded employment and training program listed under 42 USC § 303.6(c)(5).

To what extent is it expected that the IV-D Agencies consult with these other agencies concerning the state plan updates? Clearly the intent is to preserve efficiency and prevent duplicate services being provided to each participant. However, the final rule also requires each state to verify that each participant is not receiving duplicate services. OCSS clarified in the final rule answers to the questions from proposed rule that each state has discretion concerning how they would verify this, even collecting a signed document from the NCP is sufficient if State law allows it. These two sections appear to have a common goal, but the state plan requirements located in 45 CFR § 302.76 doesn't have anything that would indicate how far that consult and collaboration should go to be considered sufficient.