Public comments from the web survey were limited to two commenters, the first simply stated, “Very informative,” the second asked, “If a vocational school on the state ETPL does not offer/accept Pell Grants, can a customer utilize this school with their ITA approved funds?”

In answer to the second comment, program operators and training providers must coordinate funds available to pay for training so that WIA funds supplement other sources of training grants. In this case, if Pell Grants are unavailable, other sources of grants must be considered. The section below provides more information on the requirement to coordinate WIA training funds and other grant assistance.

20 CFR Part 652 et al. Workforce Investment Act; Final Rules § 663.320: What are the requirements for coordination of WIA training funds and other grant assistance?

(a) WIA funding for training is limited to participants who:
1. Are unable to obtain grant assistance from other sources to pay the costs of their training; or
2. Require assistance beyond that available under grant assistance from other sources to pay the costs of such training. Program operators and training providers must coordinate funds available to pay for training as described in paragraphs (b) and (c) of this section.

(b) Program operators must coordinate training funds available and make funding arrangements with One-Stop partners and other entities to apply the provisions of paragraph (a) of this section. Training providers must consider the availability of other sources of grants to pay for training costs such as Welfare-to-Work, State-funded training funds, and Federal Pell Grants, so that WIA funds supplement other sources of training grants.

(c) A WIA participant may enroll in WIA-funded training while his/her application for a Pell Grant is pending as long as the One-Stop operator has made arrangements with the training provider and the WIA participant regarding allocation of the Pell Grant, if it is subsequently awarded. In that case, the training provider must reimburse the One-Stop operator the WIA funds used to underwrite the training for the amount the Pell Grant covers. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the WIA participant for education-related expenses.

(WIA sec. 134(d)(4)(B).)
May 29, 2014

Charlie Woo, Chairperson
Workforce Investment Board
City of Los Angeles
1200 West 7th Street
Los Angeles, California 90017

Re: City of Los Angeles WIA Annual Plan for PY 2014-15

Dear Mr. Woo:

On behalf of the Archdiocesan Youth Employment Services (AYE) of Catholic Charities of Los Angeles, we wish to offer public comment on the Los Angeles City WIA Annual Plan for PY 2014-15.

As you know, the proposed plan involves an 8% cut in funding for YouthSource providers. This follows a 3% cut from last year’s allocation when youth providers already assumed a 10% cut from what was originally proposed for PY 2012-13. These combined cuts represent over 30% reduction in funding for the YouthSource delivery system during a time when unemployment and poverty rates among young people in Los Angeles are at their highest.

In view of the impact these cuts will have on services, we recommend the following:

- Reevaluate allocations and identify non-essential earmarks from existing plan such as LA Performs ($36,000) and Youth Assessment ($270,000);
- Ensure that all earmarks for support have viable performance benchmarks that effectively improve services;
- Reprogram savings from this year early instead of waiting until end of next year—preferably within 2-3 months following end of fiscal closeout;
- Include all WIA YouthSource providers in future collaborative EWDD funding grant opportunities; and
- Evaluate capacity to ensure cost-effective use of existing funds, including leveraged private resources required by contract.

We ask that the Los Angeles City WIB consider our recommendations to ensure more effective investment in preparing underserved young people for America’s future workforce.

Respectfully,

[Signature]

Robert L. Gutierrez
AYE Director
May 29, 2014

Mr. Charlie Woo, Chairperson
Workforce Investment Board
City of Los Angeles
1200 West 7th Street
Los Angeles, California 90017

Dear Mr. Woo:

On behalf of the UCLA Community Based Learning Program, I would like to comment on the Los Angeles City WIA Annual Plan for PY 2014-15.

As you know, the proposed plan involves an 8% cut in funding for YouthSource providers. This follows a 3% cut from last year’s allocation, which totals almost $100,000 from the original $900,000 allocation. As you can imagine, these cuts will decrease the number of youth we can serve. Hopefully, we can maintain our quality of service to the young people in our difficulty Los Angeles economy.

In view of the impact these cuts will have on services, we recommend the following:

- Reevaluate allocations and identify non-essential earmarks from existing plan such as LA Performs ($36,000);
- Ensure that all earmarks for support have viable performance benchmarks that effectively improve services;
- Reprogram any additional savings from this year early instead of waiting until end of next year;
- Include all WIA YouthSource providers in future collaborative EWDD funding grant opportunities;
- Assist YouthSource providers in collaborating and packaging proposal submissions; and
- Evaluate capacity to ensure cost-effective use of existing funds.

We ask that the Los Angeles City WIB consider our recommendations to ensure more effective investment in preparing underserved young people for America’s future workforce.

Sincerely,

Mary G. Keipp
Program Director