



June 15, 2015

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To Whom It May Concern:

On behalf of the New York Association of Training & Employment Professionals (NYATEP) please find attached the detailed comments we submitted today for consideration as your agencies work collaboratively to finalize the regulations to support implementation of the Workforce Innovation and Opportunity Act of 2014 (WIOA).

The implementation of WIOA is an exciting opportunity for the education and workforce systems across the country to strengthen partnerships, increase local engagement of partners and employers, and to expand known best practices. In the spirit of law, NYATEP convened a working group of members in New York State representing postsecondary institutions, adult education and literacy providers, vocational rehabilitation, workforce boards, one-stop providers, community-based and non-profit organizations, with the goal of developing detailed feedback that is informed by the unique challenges faced by the field in New York.

As you will read, our biggest concerns are related to adequately distinguishing between local and state control, preserving the flexibility intended within the law, and creating a truly integrated system that continues to serve both employers and jobseekers effectively. We also understand our ability to effectively implement WIOA will be dependent on funding from Congress, and fully expect to continue to fight an uphill battle to obtain the much needed resources necessary across all the Titles.



We appreciate your willingness nationally, and the significant outreach from the regional offices of the U.S. Department of Labor and U.S. Department of Education to solicit feedback from the field. We look forward to continuing to work with you to ensure a smooth and productive transition to WIOA.

The New York Association of Training & Employment Professionals (NYATEP) is a 501(c)3 membership association that serves education, training, employment and economic development professionals across New York State. Our membership includes the 33 workforce boards in New York State, the State University of New York and City University of New York, adult education and literacy providers, K-12 systems, One-Stop operators, economic development firms, and non-profit organizations.

Please do not hesitate to contact me directly with questions or concerns. I can be reached at 518-433-1200 ext 202 or mmack@nyatep.org. Please note we did also submit these recommendations via the regulations.gov as well.

Sincerely,

Melinda Mack
Executive Director

Cc: Gerri Fiala, USDOL
Eric Seleznow, USDOL
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