

Section	Comment	Basis
8.1.2.1	What is the source documentation for geographical preference boundaries? Extending out to the nearest local school district boundary is beyond our state legislated boundaries.	
8.1.2.2	Can you please clarify the section: The Local Workforce Development Board is ultimately responsible for all eligibility determinations with each Region.	What action does the board need to take?
8.1.2.2	Self Certification Forms. Will this be included in the application?	
8.1.2.2	Will clients have the ability to provide electronic signatures remotely?	We provide service to a lot of clients outside of the office.
8.1.2.2	Process outline for Eligibility, Verification, and Enrollment	
8.1.2.2	Add Source Documentation Appendix	
8.1.2.6	With the movement to Geo Solutions, will we be able to tell if an individual was previously enrolled? What if it was another state?	
8.1.2.6	Justification for Re-enrollment, if they are eligible and need services, is that enough justification for enrollment?	
8.1.2.7	What is the reference for notification of ineligible and related processes?	
8.1.2.7	Please rephrase to: "If a person is determined to be ineligible after enrollment"	
8.1.4.1	Would the LWDB be allowed to conduct Background Checks on Mentors? Would that be an allowable cost?	
8.1.4.6	Why does the specific purpose need to be documented when the case note documents all of the information discussed?	
8.1.4.8	May an INT follow a WEP?	
8.1.4.8	"INT participation must be limited to 20 hours per week during the school year." Need something that references under 18 and over 18 years old.	
8.1.4.9	Participants shall be provided information on in-demand industry... Are we sure it is shall and not may be provided?	

8.1.4.12	Under Requirement for timing of Assessment: It states In-school Youth, needs to add "in High School"	For OSY in post-secondary could we use their standardized tests?
8.1.4.12	One section states within 6 months of enrollment and another section states within 30 days. If we accept an assessment within 6 months would we have to retest in 6 months? If we accepted a previous assessment are we not allowed to set a basic skills goal?	
8.1.4.13	Last sentence of paragraph one the "and" should be replaced with "or"	
8.1.4.13	Are tools allowable under OST for Tools is required for instruction?	
8.1.4.15	Out-of-Area Job Search Assistance - This sounds great in theory. But I'm confused regarding what "outside their local area" is. Being a border town, technically outside the local area is Omaha, NE, however may still be reasonable for them to continue living within the region. It would be helpful to define if "outside their local area" just means job, or if searching outside of the area would require the participant to move as part of this activity.	
8.1.4.18	What is considered a Self-sustainable wage?	
8.1.4.20	Can HSED be included in 2nd paragraph?	
8.1.4.21	Are short term career pathways certificates allowable under SUG?	
8.1.5.1	Under A/DW support services are available to "members". Should this be changed to participants, clients, etc?	
8.1.5.2	Tools are not considered clothing but they should be included in a more appropriate section.	
8.1.5.1	What is considered the maximum length of time for Support Services to be available?	
8.1.5.4	What is included in vocational testing?	
8.1.5.6	Can dental be included as well as hearing aids?	
8.1.5.7	Should State and National licensure exams be included under MSS?	
8.1.5.7	Can tools be included?	

8.1.5.9	Why is there not an emphasis to partner with T2W, IVRS, IDB, WIPA, etc. to SID services. Why is there not a payer of last resort section similar to 8.1.5.6	
8.1.5.11	Legal References do not provide any information regarding this Supportive service. CH: What is the max time spent in this activity for a participant?	Can more detail on limitations be provided?
8.1.5.13	Can we include Meeting established goals?	
8.1.6.1	Self Service does not extend the date of exit; Would you please define self service services? CH: No requirement to wait to reenroll someone for at least 12 months post exit? Could have two enrollments in one year.	Does this include self-referrals to jobs?
8.1.6.1	LWDB have little say in this policy section. Any section where local control should be exercised this policy cedes this power to the state agency.	
8.1.7.0	Adult and Dislocated workers must be provided follow-up services? Language should be changed to indicate "offering" follow up services that can be declined by participants	
8.2.5.0	Can we include the codes behind each activity?	
8.3.2.1	Should it also include income eligible?	
8.3.2.1	Should it also include able to work in the US?	
8.3.2.2	What is the definition of unlikely to return?	
8.3.2.2	Should it also include the legally authorized to work in the US?	
8.3.3.2	Within Adult priority of service this policy indicates NCRC can be used to identify Basic Skills Deficiency which is not accurate. Section 3.F should be removed from the policy.	
8.3.3.2	Receives an income or is a member of a family receiving an income that in relation to family size, is not in excess of the current U.S. DOL 70 percent Lower Living Standard Income Level Guidelines* and U.S. Department of Health and Human Services Poverty Guidelines*	Does this also pertain to youth?
8.3.3.3	"A person who has served at least one day in the active military..." Shouldn't this be 180 days?	

8.3.3.4	Economic Self-Sufficiency - I'm confused at the purpose of this section. Does this mean that we would have to stop assisting after achieving a career field that is categorized as "economic self-sufficiency"? For example: We help someone to achieve their CNA, and they want to go on to get their RN. Do we have to calculate if they have met economic self sufficiency before justifying we can assist with the RN? If they met self sufficiency by this definition, would that require us to exit them? I appreciate the definition, but do not understand how this is to be utilized in practice.	
General	Can Page numbers be included	
General	Can an index and Definition section be included?	
General	The flow of the policy is confusing to read. It would also be helpful to have a fiscal section included.	

