

**Arizona's Response to Request for Comment**  
**Required Elements for Submission of the Unified or Combined State Plan and Plan**  
**Modifications under the Workforce Innovation and Opportunity Act**

The Arizona Department of Economic Security, as the grant recipient for funding under Title I, III, and IV of the Workforce Innovation and Opportunity Act (WIOA) and the Arizona Office of Economic Opportunity, who serve as staff to the Workforce Arizona Council, are submitting the response for the State of Arizona to the Department of Labor's (DOL) Employment and Training Administration (ETA) request for written comments concerning a proposed revision for the authority to conduct the information collection request (ICR) titled, "[Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act.](#)"

As requested in the ICR, the comments provided address the following:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility;
- Evaluate the accuracy of the Agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;
- Enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, (e.g., permitting electronic submission of responses).

**Comments:**

Timeliness

- The ICR for the 2024 State Plan should be issued by no later than June 30, 2023 to allow states sufficient time to coordinate with all partners and stakeholders. The ICR for the 2020 Plan was issued in September 2019, several months after our state began work on the Plan. The TEGL with the requirements for the two year Plan Modification was issued on December 14, 2021, three months before the March 15, 2022 submission date and after our state posted the Plan for public comment.
- It is unrealistic for DOL to review a plan and require a state to make edits within 3 days to a week. Each state has approval processes they must follow and it would be helpful if the DOL allowed more time for states to coordinate revisions.

State Plans should no longer be describing how states will "implement" WIOA

In the sections describing strategic goals and vision, state strategies, and state strategy implementation, states are required to describe how the state will "implement" these activities which was appropriate as states were implementing activities under the Workforce Innovation

and Opportunity Act (WIOA). In 2024, states will be submitting the third four-year state plan and should be using the plan to discuss the progress made in implementation and plans for the future.

#### Clarification on references to policies

States are asked to describe their policies and procedures in the sections describing state operating systems and policies and program specific requirements. It should be clear that providing a link to the established policy and a brief description is sufficient to meet this requirement, and that the text of the full policy is not required.

#### Clarification on the posting of performance levels for public comment

Clarification is requested regarding the posting of performance levels for public comment. States are required to submit expected performance levels with the Plan that is initially submitted in March. These expected performance levels are included in the Plan which is posted for public comment, but before final performance levels are negotiated between the state and the federal agencies. In 2024, there was some confusion as to whether states were required to post final performance levels for public comment, since these levels were not the same as the expected levels included in the version posted for public comment.

#### Portal Issues

During the modification cycle, there were issues with the portal. We encourage DOL to provide training on how to effectively utilize different functions of the portal such as attachments, saving updates, and submission to ensure the document is locked and all reviewers have the ability to view. During the modification cycle, Arizona had to create some workarounds for submitting required edits to meet DOLs deadlines though DOL made errors in locking and unlocking the documents. This caused miscommunication and inefficiency.

#### Consistency with the Review Process

During the modification cycle, there were several different reviewers and the information shared with Title II and Title IV was much different than the information shared with Titles I and III. It would be helpful if all information was consistent and shared with the Governor's delegate for submission so the appropriate edits can be made.