

**Public Comments received regarding the  
Maine Workforce Investment Act Five Year  
Strategic Plan  
2012-2016**

**March 13, 2013**

## Public Comments received from 3/7/13 through 3/12/13 concerning WIA State Plan Clarifications

**Sources**      **43**  
**Comments**    **51**

*Where*            *Sources = Emails received*

*Comments = Statements for, against or neutral in either an  
email message or attachment*

<b>New Comments</b>	<b>17 from 17 Sources</b>
<b>In Support</b>	<b>6</b>
<b>In Opposition</b>	<b>8</b>
<b>Neutral Comments</b>	<b>3</b>
<b>Re-Submitted Previous Comments</b>	<b>34 from 26 Sources</b>
<b>In Support</b>	<b>10</b>
<b>In Opposition</b>	<b>22</b>
<b>Neutral Comments</b>	<b>2</b>

- Fifty-One (51) comments came in from 43 sources
- Comments were minimal in regards to the actual changes made to the State Plan and listed within the sidebar at [www.maine.gov/swib/plan\\_html](http://www.maine.gov/swib/plan_html)
- Five (5) sources submitted both new and old comments in opposition, tallying five (5) new comments and 10 resubmitted comments
- Of the 30 comments in opposition, 28 were from Local Board members or organizations / agencies that have members in common with Local Boards
- Three (3) of the six (6) new comments of support came from business owners, with the remaining three (3) new comments of support coming from a trade association, CareerCenters and the Legislature
- Seven (7) of eight (8) new comments of opposition came from Local Board members or organizations / agencies that have members in common with Local Boards
- Six (6) of six (6) Chambers of Commerce submitted a combined six (6) comments of support

## **Sardano, Timothy J**

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**From:** Max Kaufmann <maxkaufmannjr@gmail.com>  
**Sent:** Thursday, March 07, 2013 6:44 PM  
**To:** DOL, SWIB  
**Subject:** Comments on plan

I have lived in Maine for 6 years now and came here with 25 years of real world business experience with one job for the whole 25 years. Coming to Maine was dependent upon finding employment. This was not a problem at all for me, but, I have had 5 jobs in this period of time, not due to performance issues, and am now with The State of Maine.

I think the plan is a good idea. I think we are neglecting one simple fact. The jobs that are being offered pay between \$8.00 and \$12.00/hour. I know first-hand as I have done DILLIGENT job searches 6 times. The only good paying jobs in this State for the most part require over \$500,000.00 in college education and they do not pay much until years and years of longevity. Why would employers be saying they do not have the right work force trained when they are offering nothing more than mere survival, or for people to spend the first ten to fifteen years of their employment having to pay back the loans it took to make \$40,000.00 per year?

Employers need to offer people a decent living or people will never be motivated to do much of anything different. All you need to do is spend a few months looking online, in the paper, or with the D.O.L. for jobs that are listed and it is easy to see that employers are not paying good wages. The problem will never change. I ask you, do some job searches here in Maine, especially North of Waterville and tell me how anyone is supposed to support a household on what is out there. If employers would put more on the table, people would train. I think the Governor needs to put these dollars elsewhere!

Thank You,

Max Kaufmann  
7 Thompson Court  
Clifton, ME. 04428

**(207)992-8165**

March 7, 2013

Dear Commissioner Paquette and Chairman Webber:

Thank you for the opportunity to comment on Maine's "Workforce Investment Act Strategic Plan 2012-2016. While I do not live in Maine and, therefore, cannot evaluate the details of this plan, I can say with confidence that many aspects of this plan address with creative and innovative approaches the immediate and long-term demands upon the workforce development system in Maine.

Let me point out a few areas in which I find this to be a forward looking plan:

- Workforce investments will be shifted to emphasize skill shortages, growth occupations and economic development strategies. This seems to be a logical step; however, it is one that few States seem to follow effectively.
- Business participation as customer and partner in the workforce system will be spearheaded by eight local chambers of commerce in a structure that corresponds to the State's economic regions.
- The State will increase the percentage of funds going to training. I particularly endorse the goal of moving these investments to on-the-job training (OJT) based upon an employer-demand strategy and customized training focused on existing and projected skill shortages.

There are other aspects of this plan that I find useful, but those noted above are the ones that I find most refreshing. If you would permit me one caution regarding an issue that I am certain you are considering:

- Government funding for workforce development will likely decline at least a little over the next few years. To some degree this reduction can be compensated for through consolidation and integration of workforce services. I find that the move to eight economic regions has merit, provided that the workforce infrastructure is constructed in a cost-efficient manner. To me this suggests a state-wide one-stop system must replace the independent regional approach of the past.

I wish you much success in the difficult tasks that lie ahead. If I can ever be of assistance, please do not hesitate to contact me.

Sincerely,

Robert Knight

*For information purposes:* I am Director of Workforce Policy and Government Relations at ResCare Workforce Services. The opinions expressed here are my own and do not necessarily reflect the views of my employer.

## Sardano, Timothy J

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**From:** karen@ogunquit.org  
**Sent:** Friday, March 08, 2013 8:55 AM  
**To:** DOL, SWIB

Please resubmit my comments from before. I am away and cannot access my work computer to pull up the letter I sent. Please let me know that you are able to resubmit my letter. Thank you. Karen Marie Arel (President, Ogunquit Chamber of Commerce)

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<http://link.myhosting.com/myhosting>



January 28, 2013

SWIB.DOL@maine.gov To whom it may concern:

I am writing to express my support for the State of Maine's plan to amend its workforce delivery system to ensure that a greater percentage of federal Workforce Investment Act (WIA) dollars are dedicated to training for jobs that are in demand. I understand that Maine's statewide average percentage of federal funds being used for direct workforce training has hovered below 20% in recent years and believe that we ought to seek to achieve a goal of 40% -- as the proposed plan recommends. Maine needs a workforce delivery system that is efficient, strategic and helps to train the greatest number of people possible.

Sincerely,

Karen Marie Arel  
President, Ogunquit Chamber of Commerce

OGUNQUIT CHAMBER OF COMMERCE  
PO Box 2289, Ogunquit, ME 03907      207-646-1279      Fax: 207-641-0856  
[www.ogunquit.org](http://www.ogunquit.org)      [www.visitogunquit.org](http://www.visitogunquit.org)

## Sardano, Timothy J

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**From:** Sally Sutton <ssutton@usm.maine.edu>  
**Sent:** Friday, March 08, 2013 9:33 AM  
**To:** DOL, SWIB  
**Subject:** Comments on SWIB Plan  
**Attachments:** SWIB comments 1-27-13.doc

Attached are my comments on the SWIB Strategic Plan. Thank you. Sally Sutton

Sally Sutton, MA, MSSW  
Senior Policy Analyst  
Cutler Institute for  
Health and Social Policy  
Muskie School of Public Service  
University of Southern Maine  
PO Box 9300  
Portland, Maine 04104-9300  
(207) 228-8158  
(207) 228-8138 fax  
[ssutton@usm.maine.edu](mailto:ssutton@usm.maine.edu)

January 27, 2013

State Workforce Investment Board  
State House Station 120  
Augusta, Maine 04333

RE: Comments on the WIA Strategic Plan 2012 – 2016

Dear State Workforce Investment Board;

I am writing to provide my comments on the 2012 - 2016 WIA Strategic Plan. Currently I provide staff support to the Maine Health Workforce Forum, and the comments I offer relate to the Forum and its activities and industry partnerships.

As stated in the draft plan, the Maine Health Workforce Forum has been operating as an effective industry/sector partnership for several years. A major accomplishment that can be attributed to the Forum is the state securing the \$4.9 million healthcare sector grant as a result of the networking, coordination and planning activities of the Forum. Implementation of the healthcare sector grant has been highly successful and it has far surpassed its stated objectives.

The WIA Strategic Plan recognizes industry partnerships as being a cornerstone for an effective workforce system, and this is a positive direction for Maine. The Manufacturer's Association of Maine December 2011 report *Maine's Industry Partnership/Sector Strategy* (Attachment 2) provides a good description of how an industry partnership/council should work. It states:

“ICs (Industry Councils) are business led stakeholders groups that develop strategies and policies for training their industries' workforce and make recommendations to the SWIB. ICs are supported with Workforce System funding and are provided technical assistance from state agency staff (DOL, DECD, DOE).” (p 12)

The Manufacturer Association's report may illustrate the state's vision for how industry partnerships are to function, but the State's plan provides no real guidance or information about how those industry partnerships will make recommendations or relate to the SWIB or how each is accountable to the other. The plan also does not discuss how the industry partnerships connect to the various other State, local and regional entities involved in the system. This is an important issue to address because for the partnerships/councils to be effective, they will generally need to function at the different geographic levels.

The Manufacturer Association's report also states that the industry councils are supported with workforce system funding. The State plan does not discuss how it intends those councils/partnerships to be supported. This is also an important issue for the plan to address as the resources available or needed to fund an industry partnership may vary from sector to sector, and without support from the workforce system, a partnership may not be sustainable or able to function at the level appropriate to meet the demands of its sector.

Clarification of the various roles of the SWIB, industry partnerships, etc; and addressing the funding needs and assuring the infrastructure of these sector partnerships is key if they are to be the cornerstones of the state's workforce system.

The WIA Strategic Plan rightly places an important emphasis on the need for data throughout the workforce system. My comment relates to the data needs currently faced by the health sector. If the system is to be data driven, there is a need for access to information about health professionals that is no longer being collected or analyzed through the Office of Data Research and Vital Statistics and appears to only be available through the health professional licensing boards. This data is critical for predicting supply and demand and also determining the educational capacity within the state to meet the state's health workforce needs. It is important that the State invest in data collection and developing supply and demand analytic capacity if it is to have the information it needs for an effective workforce system.

Given the range of health professions, from entry level to some of the most highly trained in the state, a wide range of training resources need to be made available to meet the various needs of the different professions, as well as ensuring that the educational programs within the state have the training capacity (faculty and clinical opportunities) to meet both current and future demand. Within the next decade Maine's health sector will face increased demand related to an aging workforce, including the aging faculty that are required to train new health professionals. If the state's health workforce demands are to be met, Maine's WIA Strategic Plan must also address the capacity needs within the state's educational institutions that will be required to meet that demand.

Thank you for your consideration of my comments.

Sincerely,  
Sally Sutton  
Project Director  
Maine Health Workforce Forum

Senior Policy Analyst  
Muskie School of Public Service  
[ssutton@usm.maine.edu](mailto:ssutton@usm.maine.edu)  
207-228-8158

## Sardano, Timothy J

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**From:** Mike Hamlyn <mhamlyn@downeastmachine.com>  
**Sent:** Friday, March 08, 2013 1:10 PM  
**To:** DOL, SWIB  
**Subject:** Comment on SWIB 2012-2016 Plan

I am one of the owners and the managing partner of Downeast Machine & Engineering, Inc. Our main operation is in Mechanic Falls, Maine and we have a smaller shop in Oxford and a much larger shop we opened in Leeds in 2011. We employ over 70 people with most of them welders, fabricators, millwrights, and CNC and manual machinists. Over the last 3 or 4 years we have added over 20 people and more than 40 over the last 8 years. I can tell you from my personal experience the pool of people is very shallow. I have regularly used the Maine Job Bank to hire new people and have had some success, however, most of our new hires come here because they know who we are as a company or because they know other people who work at DEME. Many of our most skilled people have come from other companies that downsized or went out of business. We have been very fortunate that way. However, the majority of the applicants I meet with who have already lost their jobs usually do not have the same skill set and require additional training. Very few companies have enough bottom rungs on the skill ladder to bring in people and train them. In an effort to increase the openings on the bottom of the ladder DEME recently contracted with Central Maine Community College, at our own expense, to run a 12 week Beginner Blueprint Reading course and a follow up Advanced Course. Chris Paradis at CMCC was very helpful in setting this in motion. The beginner class has 18 DEME employees attending, including one Poland High senior who works part time at DEME now and will go to full time when he graduates in May. While DEME paid for the course and split the cost of the textbook with the employees, the employees are there voluntarily and on their own time. They recognize that by improving their skills their job becomes more secure and they are more likely to get a wage increase. I think that by holding the classes at CMCC, as opposed to in our shop, the employee experiences a greater sense of self improvement, and they are earning actual college credit hours which may entice some of the employees to continue on with additional classes unrelated to work.

While I agree with this initiative on job skill training many of the applicants I have met suffer from lack of nonwork related education. Substance & alcohol abuse (young welders in particular) and often the resulting loss of drivers licenses which severely limits their employment geographic range. Personal financial planning and budgeting. Family planning. Reading and math skills. Interpersonal communication.

I hope that when this program is finally implemented DEME will have an opportunity to participate.

Thank You

Michael R. Hamlyn

Managing Partner

Downeast Machine & Engineering, Inc.

26 Maple Street

Mechanic Falls, Maine 04256

[mhamlyn@downeastmachine.com](mailto:mhamlyn@downeastmachine.com)

207-345-8111

**Sardano, Timothy J**

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**From:** Wayne Leach <hawkeye1937@gmail.com>  
**Sent:** Saturday, March 09, 2013 11:45 AM  
**To:** DOL, SWIB  
**Subject:** US Dept. of Labor & Maine Work Force

Why do the people of Maine need input from the federal government's unconstitutional department's bureaucrats to find work?

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"A legislative act contrary to the Constitution is not law." Justice John Marshall

**DENY CONSENT** - Nullify the unlawful !!

## **Sardano, Timothy J**

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**From:** Mel Clarrage <mclarrage1@maine.rr.com>  
**Sent:** Monday, March 11, 2013 9:04 AM  
**To:** DOL, SWIB  
**Subject:** Public comment

Please use my previously submitted comments.

Thanks  
Mel Clarrage  
SWIB Member

## Sardano, Timothy J

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**From:** Mel Clarrage <mclarrage1@maine.rr.com>  
**Sent:** Monday, January 28, 2013 8:59 AM  
**To:** DOL, SWIB  
**Subject:** Support for WIA state Plan

To:

SWIB Director

From: Mel clarrage

221 Longfellow St.

Westbrook Me, 04092

Subject: Support for the Workforce Investment Act. State Plan.

Date: January 2013

As a member of the State Workforce Investment Board I am pleased to support the amended state plan. I have been honored to serve the past two administrations as Maine has attempted to increase business input and redirect resources to TRAIN Maine residents.

As a member of the SWIB I am encouraged that we are on the right track as we are trying to restructure our system and INCREASE local business input from our Chambers of Commerce, tracking more data which will allow for targeted training and the cross departmental utilization of dollars.

I was quite disappointed to hear that the plan submitted last fall was not approved and the politics involved which delayed progress. Both Maine's businesses and people are in need of systemic change and the longer it takes for us to have a current plan we are not able to address the skill gap that has been identified.

At our January 18<sup>th</sup> meeting one of our local WIB's stated that in his area they reduced the number of service providers from three to one, is it a coincidence that area has increased the percentage of funds directly going toward training??

It is very clear that we have a great deal of duplication and the direction Maine is heading should allow us to reduce this and increase training for the end users of our state.

I am hopeful that Federal Department of Labor will set politics aside and approve this plan so that Maine can move forward with our critical work. This is truly not a political party issue it is simply about doing what is best for Maine business and our citizens.



## Sardano, Timothy J

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**From:** Amy Downing <adowning@mainechamber.org>  
**Sent:** Monday, March 11, 2013 10:56 AM  
**To:** DOL, SWIB  
**Subject:** WIA Strategic Plan - Public Comment Period

Please resubmit the previous letter in support of the plan from Dana Connors at the Maine State Chamber of Commerce.

Best,  
Amy

### **Amy Downing**

Member Services & Program Manager | [Maine State Chamber of Commerce](#)

[Program Coordinator](#) | [InternHelpME.com](#) | [Chamber BlueOptions](#)

[Program Director](#) | [MACCE](#)

125 Community Drive, Suite 101 | Augusta, Maine 04330

**P:** 207-623-4568 ext.104 | **F:** 207-622-7723

January 28, 2013

Governor Paul LePage  
1 State House Station  
Augusta, ME 04330

RE: Maine State Chamber of Commerce Comments on Workforce Investment Act Five Year Strategic Plan

Governor LePage:

Please accept this letter as the Maine State Chamber of Commerce's comments to the State Workforce Investment Board's Five Year State Strategic Plan. We acknowledge this is the states attempt to address concerns raised in their initial proposal and we believe the board has done an outstanding job in preparing and presenting a plan to help ensure that Maine has a robust workforce for years to come.

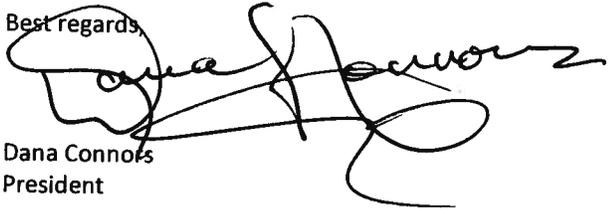
The state strategic plan as is currently drafted takes into consideration the mission of the local/regional chambers of commerce. Maine's local chambers of commerce serve as the voice of Maine businesses and are in constant communication with their members who are Maine's business community. The strategic plan proposal to use the local chambers of commerce as conveners and facilitators in regards to identifying the need for specific local job training and the skills gap in their regions is a natural fit.

Secondly, as a State, we always want to ensure that as many workforce training dollars make it directly to the workers we need for today and tomorrow. The draft strategic plan not only recognizes this fact but attempts to ensure that funding for job training gets into the hands of Maine's workforce that needs it most. Incorporating the local/regional chambers of commerce into the workforce investment strategic plan over the next four years will not only enhance the communication statewide to help direct the money to workforce skills development, it will help the funds to be disbursed equally across the state.

Lastly, it is important to recognize that the draft strategic plan does not diminish any other economic development roles that currently exist – nor should it. All economic development entities throughout all the municipalities, counties and regions in the state are invited to participate in this proposed plan. Maine's economic development network is vital to the future of our state and we need to continue to support it while always improving on what is in place. The more of us that work together can only better enhance moving the state forward and addressing the pressing need of the workforce skills gap that we see being a detriment to our future successes as a state.

Thank you for bringing this plan forward, the Maine State Chamber of Commerce stands ready to work with you and your staff to ensure that Maine's workforce is and continues to be world class. If you have any questions please feel free to contact me at 623-4568 ext. 103.

Best regards,

  
Dana Connors  
President

**Sardano, Timothy J**

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**From:** Administrator <administrator@sagcounty.com>  
**Sent:** Monday, March 11, 2013 3:05 PM  
**To:** DOL, SWIB  
**Subject:** Comments on March 13th Changes  
**Attachments:** Letter to SWIB.doc

**COUNTY OF SAGADAHOC, MAINE  
ADMINISTRATIVE OFFICES**

**CHARLES E. CROSBY, III**  
DISTRICT 1  
BOWDOIN & TOPSHAM

**CAROL A. GROSE**  
DISTRICT 2  
BOWDOINHAM, GEORGETOWN, PHIPPSBURG  
RICHMOND & WOOLWICH

**LAWRENCE M. DAWSON**  
DISTRICT 3  
ARROWSIC  
BATH & WEST BATH

**PAMELA A. HILE**  
COUNTY ADMINISTRATOR  
[administrator@sagcounty.com](mailto:administrator@sagcounty.com)  
Phone: (207) 443-8202  
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**ROBIN DAYTON**  
DEPUTY ADMINISTRATOR  
[r.dayton@sagcounty.com](mailto:r.dayton@sagcounty.com)  
Phone: (207) 443-8202  
Fax: (207) 443-8213

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Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333  
Mr. Fred Webber, Chair, State Workforce Investment Board (SWIB)

Dear Mr. Webber:

I am writing as a four term Sagadahoc County Commissioner, former Topsham Selectman and State Representative having served more than 20 years in public service and as a devotee of the Democratic process—one based on notions of due process and a government which conducts affairs in an open manner. From this vantage point — as an observer and participant of what has been occurring relative to the proposed WIA Plan process (and work of the State Workforce Investment Board) my opinion is that the Le Page administration’s process is flawed if not intentionally in violation of the principles behind "open" government.

Throughout the redrafted WIA Plan it is once again stated that the Governor and his officials consulted with LWIBs & CLEOs, but the two brief encounters were not a consultation. Consultation generally means “to ask the advice or opinion, to confer or deliberate together”. Both on October 6, 2011 when meeting with the LWIB directors and February 7, 2012 when Governor Le Page and his staff met with the CLEOs, he stated his intentions, but a consultation never occurred. Both the LWIB directors and CLEOs were told that not enough of the WIA Program dollars were being spent on direct training and that the LWIBs were being done away with and the state would become a single state delivery area. The discussion was one-sided – the edict unilateral.

After the USDOL denied the State of Maine’s WIA Plan and Waiver Request in November 2012, the State was directed to re-write its WIA Plan and to consult with the CLEOs and the LWIBs on the new state plan. Although it appears that the state staff began rewriting the state plan immediately, consultation with the CLEOs did not occur. In fact the CLEO’s learned of the new state “local area designation strategy” along with the rest of the state of Maine when the redrafted state plan was posted on the SWIB web site late on 1/18/13.

The LWIB Directors did attempt to engage the state on development of the new plan via e-mail. However, these requests for inclusion were ignored. Simultaneously, there were a number of SWIB policy workgroup meetings that were held during December 2012 and January 2013, for the purpose of developing seven over-arching state policies which were since integrated into the state plan. Unfortunately, the dates of these workgroup meetings were not readily publicized and this had a serious impact on LWIB attendance. The two exceptions of attendance came about because a SWIB member on their own cognizance, chose to forward an e-mail to an LWIB Director.

On January 8, 2013 the MDOL staff reached out to the LWIBs, for the first time, but only on a specific issue. State staff e-mailed LWIB directors asking them to identify strategies that would specifically address the issues and conditions highlighted in the Economic Impact Analysis section of the plan. Unfortunately, since they did not have access to the state's over-arching vision and no knowledge of whether the current local areas were even being included in the new plan, it was simply impossible to provide meaningful input, especially with only a few working days to respond. This was the only instance of the state involving the LWIBs in WIA Plan development—an e-mail request.

The concept of eight local areas was only mentioned for the first time on 1/18/13 at the end of the SWIB meeting. In fact it was 10:53 p.m. when the revised WIA plan was posted on the state web site. It was only then, that CLEO's and LWIB's learned of the new state proposed local area designation strategy. The LWIBs/CLEO had no foreknowledge that this was going to be announced.

Although the four LWIB Directors were present at the 1/18/13 SWIB meeting, and did have a chance to provide input on policies, the policies were already drafted. Regrettably, their inclusion at this juncture was not fully constructive as not only were the policies already written, but the LWIBs had no knowledge of what the rewritten 2013 WIA plan looked like; its vision, goals, key elements, outcomes and strategies were not shared until after the policies had been voted on and only after the 1/18/13 SWIB meeting had occurred.

As stated, on January 18th, 2013 the state plan was released for public comment. The public comments are due to the SWIB on January 29th, 2013. This effectively provides interested parties with a seven working day period in which to provide public comments since January 21st, 2013 is a national holiday. Given the gravity of the proposal, not to mention the length of the document submitted, a seven working day period is simply unreasonable. The administration has also decided not to conduct a public hearing despite the fact that the subject matter is of great public concern. All this is further evidence that the administration has truly limited public input on such a vital matter.

It is interesting to note that TEGL 37-10 provides:

“The WIA regulations at 29 CFR 661.230(d) specify that modifications are subject to the same public review and comment requirements that apply to the development of the original State Plan; the state must provide an opportunity for public comment on and input into the development of the modification before submitting it to ETA.”

The initial Maine WIA State Plan of 2000 provided a full 60 day public comment period. In light of this, the administration's belief that seven days is reasonable confirms their lack of interest in public input.

Lastly, but none the less disturbing is the fact that despite all the aforementioned failings in process the one thing the Maine Department of Labor chose to do was to direct their front line CareerCenter managers (paid by Wagner Peyser funding) to solicit our County Commissioners support of the plan. The CareerCenter managers directly contacted Commissioners asking for a public comment letter in support of their plan.

For the record, here is my public comment letter and it is not in support of the proposed Maine State WIA Plan.

Sincerely yours,

Charles E. Crosby, III  
Sagadahoc County Commissioner  
District 1

## Sardano, Timothy J

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**From:** WFMEFD <wfmefd@WaterfrontME.com>  
**Sent:** Monday, March 11, 2013 3:37 PM  
**To:** DOL, SWIB  
**Subject:** FW: WATERFRONT MAINE - Plesae resend WIA state plan comment letter  
**Attachments:** img-311125652-0001.pdf

**Importance:** High

Good afternoon,

Please include this letter for public comment regarding the new draft of the WIA state plan.

Thank you,  
Martha Kneeland  
Waterfront Maine  
14 Maine Street, Box 15  
Brunswick, Maine 04011  
207-729-7970  
[mkneeland@waterfrontme.com](mailto:mkneeland@waterfrontme.com)



It has come to my attention that the Governor is now proposing to expand the number of local areas as opposed to dissolving them as he had intended on doing in his last plan. This is a real departure from his original cost savings rational proposed in the Sept. 2012 WIA Plan. I am glad to know that this expansion would mean that the current workforce investment board's mechanism i.e., Coastal Counties Workforce, Inc. (CCWI) in our area, would remain intact. However, as a local landlord, regional real estate developer and business person, I am concerned that the governor's plan to now expand the work i.e., going from one local area to three local areas, which Coastal Counties Workforce, Inc. would have to take on without providing additional revenue, is completely unrealistic. Any business person can tell you that you can't augment work load by over 100% without increasing financial resources for that kind of increased output.

Waterfront Maine owns and manages Fort Andross, a Mill Complex located on the Androscoggin River in Brunswick, Maine, just north of Portland, adjacent to Routes 1 and 95. This historic brick structure, once known as the Cabot Mill, has been rechristened "Fort Andross" after the original pre-revolutionary fort erected on the same site in 1688. Over the years, the Mill has served a number of companies in a variety of businesses, including the manufacture of cotton cloth, woolen broadcloth, synthetics, shoes, brushes and woven fiberglass. In this tradition, the building's phased renovation has followed a mixed use format, providing prime office, retail, light manufacturing and warehouse space. This business center has attracted architectural, engineering and law firms, as well as media, financial services companies and not-for-profits. The building provides a unique and affordable opportunity for area businesses to upgrade their image while allowing for future expansion.

Successful ongoing and future expansion of the Fort Andross complex and an environment of economic prosperity as a whole, requires that organizations like CCWI are able to focus on obtaining additional training resources such as discretionary grants for our region. If CCWI is now made to take on three areas without additional resources to hire the additional needed staff, they will be unsuccessful.

I once again urge you to reconsider your approach to reorganizing Maine's local areas. The four we have are, from this business owner's perspective, sufficient.

Thank you for your time and consideration,

Sincerely,  
  
Anthony Gatti

Waterfront Maine  
14 Maine Street  
Brunswick, Maine 04011

Brunswick, ME: 207-729-7970

New York, NY: 212-695-8090

## Sardano, Timothy J

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**From:** Chris Trider <chris@ibew1253.org>  
**Sent:** Monday, March 11, 2013 3:48 PM  
**To:** DOL, SWIB  
**Subject:** Public Comment  
**Attachments:** swib response.pdf

Please see attached comment.

Thank you,

Christopher D. Trider  
Training Director  
Augusta Electrical JATC  
176 Main Street  
Fairfield, Maine 04937  
office (207) 453-0135  
cell (207) 215-7298  
email [chris@ibew1253.org](mailto:chris@ibew1253.org)  
website [www.ibew1253.org/JATC.htm](http://www.ibew1253.org/JATC.htm)

## Augusta Electrical Joint Apprenticeship and Training Committee

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*Christopher D. Trider*  
Training Director

176 Main Street  
Fairfield, Maine 04937

Phone: (207) 453-0135  
Fax: (207) 453-1303  
Email: [chris@ibew1253.org](mailto:chris@ibew1253.org)

January 28, 2013

Fred Webber, Chair

State Workforce Investment Board  
120 State House Station  
Augusta, ME 04333

Dear Mr. Webber:

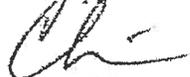
I am writing to comment on the 2013 Workforce Investment Act (WIA) State Plan.

As an organized labor representative and member of the Coastal Counties Workforce Inc. (CCWI) Board, I have seen first-hand the good work that is being done in the CCWI Local Area. The number of Maine workers who are receiving training and obtaining jobs is certainly impressive. From my perspective, the use of funds has been appropriate, frugal and effective. In the 2012 State plan, the State indicated that it wanted a reconfiguration to a State Workforce Investment Board (WIB) and 8 local service areas because it wanted to reduce administrative redundancies and increase cost effectiveness. Now in its revised 2013 plan, the State Plan indicates that a transition to eight Local Workforce Investment Boards (LWIBs) would better serve the businesses, job seekers and workers of Maine.

Although no one could or should argue against the importance of cost-effectiveness in administering state or federal taxpayer dollars, when analyzing program and system effectiveness, capacity must be taken in to account. The State plan's intention to encourage a DOUBLING of LWIBs is unsustainable given the current federal and state resources available. This reconfiguration will also severely reduce the regional capacity to align and seek other resources and provide necessary accountability. CCWI has sought and obtained \$19 million of additional job training funds in the past five years. Three new LWIBs in place of CCWI's proven capacity does not create an environment that best serves the coastal counties area.

I would hope that the most recent version of the State plan be reconsidered and that the State engage the LWIBs in a constructive dialogue to achieve its stated goals. There are a lot of dedicated people doing great things with the current system. They are an important resource in the solution.

Sincerely,



Chris Trider  
CCWI Board Member and IBEW Training Coordinator

## Sardano, Timothy J

---

**From:** Rick & Ann Parent <parton@midcoast.com>  
**Sent:** Monday, March 11, 2013 4:55 PM  
**To:** Oswald, Garret J.  
**Subject:** Fw: COM. PARENT (Please resend your WIA State Plan Comment Letter)  
**Attachments:** img-311125804-0001.pdf

**Importance:** High

Garret;

Would you please include the attached comment the new draft of the State Plan.

Thanks;

Rick Parent; Knox County Commissioner

>  
> From: "Oswald, Garret J." <[Garret.J.Oswald@maine.gov](mailto:Garret.J.Oswald@maine.gov)>  
> Date: Thursday, March 7, 2013 6:17 PM  
> To: <undisclosed-recipients;>  
> Subject: State Revises WIA Strategic Plan - Public Comment Period  
>  
> Based on feedback from the United States Department of Labor  
> Employment & Training Administration, Maine's 2012 - 2016 Workforce  
> Investment Act Strategic Plan has been revised (see list of revisions  
> below). The State Workforce Investment Board is accepting public  
> comments regarding the revised Plan, and we encourage you to take the  
> opportunity to express your opinion.  
>  
> The revised plan can be viewed at [www.maine.gov/swib/wia\\_plan.html](http://www.maine.gov/swib/wia_plan.html)  
>  
> Public comments will be accepted via e-mail at [swib.dol@maine.gov](mailto:swib.dol@maine.gov) or  
> faxed to (207) 287-5292, from 5:00 PM on 3/7/13 until 5:00 PM on  
> 3/12/13.  
>  
> If you have previously submitted a comment and want to have it counted  
> in this round of public comments, you can do so by replying to  
> [swib.dol@maine.gov](mailto:swib.dol@maine.gov) and expressing your desire to resubmit your  
> previous comment.  
>  
> The following changes have been made to the Strategic and Operational  
> sections of the plan;  
> - Page 39 - 40; Highlighted sections  
> - Page 59; Organizational Chart  
> - Pages 61 - 62; State Workforce Investment Board Membership List  
> - Pages 62 - 66; Highlighted sections  
> - Page 82; Highlighted section  
> - Pages 107 - 110; Highlighted sections  
> - Pages 118 - 121; Allocation Chart, highlighted sections, Workforce  
> System chart

- >
- > The following changes have been made to the Attachments section of the
- > Plan;
- > - Attachments G and M from the previous draft of the Plan have been
- > omitted
- > - Attachments D, E, H, L, and Q from the previous draft of the Plan
- > have been revised
- > - Attachments T, U, and V are new attachments that do not appear in
- > the previous draft of the Plan
- >
- > The following changes have been made to the Assurances section of the
- > Plan;
- > - Assurance 29 has been revised to explain that Maine does not run
- > stand-alone summer youth employment programs and that Local Workforce
- > Investment Boards that do so must have their own criteria for awarding
- > grants and contracts for this element of their local youth programs
- > - Assurance 36 has been revised to explain that Maine has not chosen
- > to establish definitions and eligibility documentation requirements
- > for "requires additional assistance to complete an education program,
- > or to secure and hold employment"
- >
- >
- > Thank you.
- >
- >
- > Garret Oswald
- > Director, State Workforce Investment Board State House Station 120
- > Augusta Maine, 04332
- >
- > Office 207-621-5087
- > Cell 207-592-1455
- >
- >
- >
- >
- >
- >>
- >

**Rick Parent, Knox County Commissioner  
Knox County Office  
62 Union Street  
Rockland, Maine 04841**



January 25, 2013

Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333

Dear Mr. Webber:

As Knox County Commissioner, for 5 years now, I can tell you from my experience and conversations with my constituents that it is untrue that my county's communities are under served as suggested by the proposed WIA plan. It makes no sense to redesign a system which is working on a false supposition i.e., that "larger cities in those areas dominate the services and the general workforce development conversation." As a matter of fact, I am convinced that the services being received are sufficient based on the resources available. Granted, if more resources were available there is no doubt that we would welcome them.

For the time being, until more resources are made available, please keep our system as it is—four local areas.

Sincerely,

  
Rick Parent  
Knox County Commissioner

**Sardano, Timothy J**

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**From:** Elaine Makas <makas@maine.edu>  
**Sent:** Monday, March 11, 2013 5:48 PM  
**To:** DOL, SWIB  
**Subject:** Workforce Investment Board letter

Dear Sir or Madam:

Please include in your consideration (for this round of public comments) the letter that I sent previously (in late January) regarding this matter.

Thank you.

Best regards,

Elaine Makas

January 29, 2013

Dear Sir or Madam:

I serve on the CLEO Board in Area 3 and as the CLEO representative to our Local Workforce Investment Board, and I am writing to express my concerns about both the Governor's revised WIA Strategic Plan and the way in which this revised plan has been developed.

I submitted a letter several months ago expressing my opposition to the Governor's original restructuring plan. My concerns at that time centered on the replacement of an existing organizational structure with a new structure, in my estimation, an action that would dismantle an efficient system and replace it with an experimental model that promised less, rather than more, local input and control.

I am equally concerned about the Governor's revised plan for a similar reason. In this instance, the proposed plan would split the existing LWIB regions into smaller components, requiring more oversight, more reporting, and, most important, more administrative costs in a period of increasingly limited funding. Again, the proposed plan would replace an existing organizational system that works efficiently with an experimental model that promises little benefit.

In these difficult economic times, we must allocate our resources wisely. This can best be done by improving the existing system to work even more effectively. I believe that this was the intention of the recommendations by the USDOL in its rejection of the requested waiver: that the Governor work with both the CLEOs and the (existing) LWIBS to improve the provision of services, rather than to replace the existing organizational structure. Sadly, this recommended collaboration did not take place.

I encourage the US Department of Labor to again deny the Governor's request to drastically change an effective system and to again recommend that he and his staff work collaboratively with the CLEOs and the LWIBs to improve this efficiency further.

Sincerely,

Elaine Makas

Androscoggin County Commissioner

**Sardano, Timothy J**

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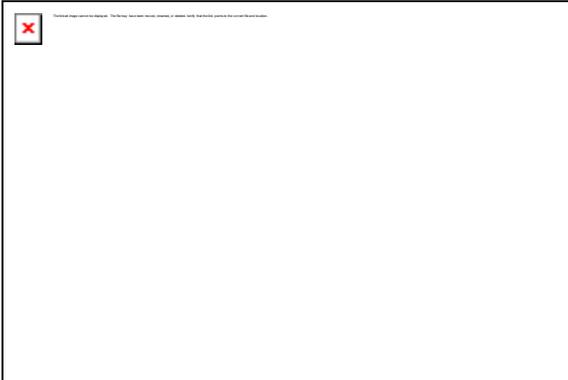
**From:** Dagmar Decker <dagmardecker@gmail.com>  
**Sent:** Monday, March 11, 2013 6:00 PM  
**To:** DOL, SWIB

I wish to resubmit my previous comment.

**Sardano, Timothy J**

---

**From:** Dagmar Decker <dagmardecker@gmail.com>  
**Sent:** Monday, January 28, 2013 10:16 AM  
**To:** DOL, SWIB  
**Subject:** Concerned Citizen



**Riverside Home, LLC**

***"Home for Happy Seniors"***

**Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333**

January 27, 2013

Dear Maine State Workforce Investment Board:

This letter is in response to the Governor's 2012 Workforce Investment Act Strategic Plan. I am a long time Human Resources professional and have collaborated with Coastal Counties Workforce, Inc. for several years to address the employment and training needs of employers

and employees throughout the state. The crux of the plan appears to rely squarely on the input of Chambers of Commerce, membership organizations, to provide guidance on how to direct federal dollars to meet business needs. While I appreciate the Governor's intention to focus more on employers, and dedicate more federal resource to workforce training, I am concerned about how the Plan will directly benefit me and other local businesses within the confines of a fairly restrictive piece of federal legislation.

My understanding is that there are certain federal restrictions within the Workforce Investment Act which are beyond the control of state or local policymakers. For instance, the WIA program cannot serve incumbent workers without a waiver, and can only then do so for the purposes of layoff aversion, which does little to help businesses who may not be currently hiring but who desperately need to upgrade the skills of their CURRENT workforce to remain competitive and thrive. In 1996, the State of Maine created the Governor's Training Initiative (GTI) to supplement the WIA workforce system so that employers could have this important training need met. Maine served thousands of incumbent workers annually up until the program was eliminated by the current State administration.

At the end of the day, whether the governor's proposal for workforce system restructuring is approved or not, the resources to effectively serve employer needs, specifically their incumbent workers training needs will still not exist in Maine. If the State of Maine provided needed resources to supplement WIA, this incumbent worker need could once again be met.

Dismantling the current workforce system – whether by reducing the workforce boards to one or increasing them to eight, both of which come with their own limitations – does nothing to address incumbent worker training that Maine businesses like mine desperately need assistance with.

Thank you for your time and consideration.

Sincerely,

Dagmar Decker

Administrator

**Riverside Home, LLC**

**10 Brooklyn Heights**

**Thomaston, ME 04861**

**207-354-6665**

## Sardano, Timothy J

---

**From:** Denise Griffin <denise.griffin@thefirst.com>  
**Sent:** Monday, March 11, 2013 6:59 PM  
**To:** DOL, SWIB  
**Subject:** FW: Urgent: Resend WIA State Plan Comment Letter  
**Attachments:** img-311125237-0001.pdf

**Importance:** High

Garret,

Please find my comments attached.

Denise Griffin, SPHR  
The First, NA

From: "Oswald, Garret J." <[Garret.J.Oswald@maine.gov](mailto:Garret.J.Oswald@maine.gov)>  
Date: Thursday, March 7, 2013 6:17 PM  
To: <undisclosed-recipients:;>  
Subject: State Revises WIA Strategic Plan - Public Comment Period

Based on feedback from the United States Department of Labor Employment & Training Administration, Maine's 2012 - 2016 Workforce Investment Act Strategic Plan has been revised (see list of revisions below). The State Workforce Investment Board is accepting public comments regarding the revised Plan, and we encourage you to take the opportunity to express your opinion.

The revised plan can be viewed at [www.maine.gov/swib/wia\\_plan.html](http://www.maine.gov/swib/wia_plan.html)

Public comments will be accepted via e-mail at [swib.dol@maine.gov](mailto:swib.dol@maine.gov) or faxed to (207) 287-5292, from 5:00 PM on 3/7/13 until 5:00 PM on 3/12/13.

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**From:** Denise Griffin <denise.griffin@thefirst.com>  
**Sent:** Friday, January 25, 2013 1:59 PM  
**To:** DOL, SWIB  
**Subject:** Public Comment to Proposed State Workforce Plan

To whom it may concern:

As a member of the Coastal Counties Workforce Board, Chair of the Coastal Counties Workforce Board's Youth Council, and the Human Resources Officer for a regional Maine business, I am writing to express my concerns regarding this revised WIA State Plan. From my vantage point there are issues with regard to the structure being proposed as well as the lack of consultation with LWIB's and CLEO's in the devising of this plan.

The September 2012 plan, that was ultimately denied approval by USDOL, sought to realize a perceived cost savings by consolidating administration by allowing the State Workforce Investment Board (SWIB) to carry out the duties of LWIB's in each of eight Chamber Regions. Ironically, the WIA State Plan currently being submitted for approval does the opposite and proposes a move from four LWIB's to eight LWIB's.

This eight LWIB structure has significant implications for our Region—Area 4, as according to the Governor's new plan there would now be three local areas between the six counties were currently serve and thus would require the establishment of three LWIB's. In addition, per WIA requirements at 29 CFR §2864, there would need to be One-Stop delivery services, "at not less than one physical center in each local area" which would mean having to create two more One-Stops in our Region-Area 4 (alone) with no increase in federal funding nor any state investment.

It is very disappointing that once again this process has played out in such a way that the existing LWIB's and CLEO's were only informed of what the State Plan envisioned after the fact. I urge you to reconsider this approach to redesigning Maine's employment and training infrastructure and work within the current system to continuously improve how we meet the needs of Maine's people and businesses.

Please contact me with questions or concerns.

Denise C. Griffin, SPHR

---

**Denise C. Griffin, SPHR** | AVP, Human Resources  
**The First, N.A.**, a division of The First Bancorp  
tel 207.563.3195 ext. 2060 | 800.564.3195 ext. 2060  
fax 207.563.2628  
P.O. Box 940 | Damariscotta, Maine 04543  
[denise.griffin@thefirst.com](mailto:denise.griffin@thefirst.com)  
[www.thefirst.com](http://www.thefirst.com)

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## Sardano, Timothy J

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**From:** Betty Johnson <betjohnson@tidewater.net>  
**Sent:** Monday, March 11, 2013 9:15 PM  
**To:** DOL, SWIB  
**Subject:** Letter sent during the prior comment period- resubmit  
**Attachments:** CLEO letter Commissioner Betty Johnson.pdf

I would like to resubmit my previous comment. I would like to resubmit my previous letter as nothing in the new plan or changes change anything for Waldo County except to take away some opportunities by removing Cumberland County from our resources.

Thank you,

Commissioner Betty Johnson, CLEO

STATE OF MAINE  
COUNTY OF WALDO  
COURT OF COUNTY COMMISSIONERS

District

1 Betty I. Johnson 323-3767  
2 William D. Shorey 548-6114  
3 Amy R. Fowler 993-2292



Phone (207) 338-3282  
Fax (207) 338-6788

E-mail: [commissioners@waldocountyme.gov](mailto:commissioners@waldocountyme.gov)

Barbara L. Arseneau  
County Clerk

39-B Spring Street  
Belfast, ME 04915



David A. Parkman  
Treasurer

Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333

January 25, 2013

Dear Mr. Webber:

As Waldo County Commissioner, although I appreciate the concern your plan articulates for rural counties i.e., that my County maybe underserved because WIA resources are dominated by larger metropolitan areas, I disagree with the notion that an entire state's local WIA areas must be altered to ensure more equity in services. With the conscientious oversight that our CLEO, LWIB and administrative entity Coastal Counties Workforce, Inc. (CCWI) have all employed in the execution of our WIA duties, it is clear that my county's residents and business are not underserved.

Given the limited resources available, in my opinion, it is best to keep the current system intact so that our administrative entity, CCWI, can continue the good work it does by focusing on obtaining discretionary grants and exacting WIA performance. If you create eight areas, the administrative burden you will unnecessarily create will work against these most important goals.

Sincerely,

Betty I. Johnson  
Waldo County Commissioner

## **Sardano, Timothy J**

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**From:** Bob Schmidt <BSchmidt@llbean.com>  
**Sent:** Monday, March 11, 2013 9:27 PM  
**To:** DOL, SWIB  
**Subject:** Resubmit public comment

Per the email I received from Garrett Oswald on Thursday March 7, 2013 I respectfully request that my previously submitted comment on the state plan be resubmitted.

Please let me know if you have any questions.

Robert E Schmidt  
Board Chair Coastal Counties Workforce Investment Board  
HR Manager  
L.L.Bean Inc.

January 23, 2013

Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Mr. Webber

I am the Chair of the Coastal Counties Workforce Board and the Human Resource Manager for L.L. Bean.

I am concerned that Governor Le Page's new WIA State Plan which includes a strategy to double the number of Local Workforce Areas in Maine from four to eight is not viable for the state of Maine.

While, I believe there is good reason for Maine's Workforce System to partner with the Chambers of Commerce, aligning the local areas to the Chamber/tourism regions is simply unnecessary and creates unintended consequences.

Maine's Workforce System has partnered with the Chambers of Commerce as far back as 1992 when Maine adopted the Business Visitation Program. The crux of this program was a business survey mechanism coordinated by local chambers of commerce. The data that was gathered through this effort provided local partners including the workforce system with valuable information on business hiring trends and an inventory of needed skills training. It seems to me that the state plan seeks to also use data from Chambers of Commerce to provide the Workforce System with meaningful information to inform its work. I think a strategy to gather data can certainly add value to the work of the system.

However, forcing the alignment of local workforce areas with chamber regions goes too far and actually creates problems rather than solves any. Costs or "resources" are a very real concern especially in light of consistent yearly decreases in WIA allocations and at a time when our population is made up of ever increasing long-term unemployed residents requiring more costly (i.e., longer term) services. For example, in our current six county region, according to the Governor's new plan there would now be three Chamber Regions i.e., three local areas and thus we would be required to establish three LWIBs. In addition, per WIA requirements at 29 CFR §2864, we would have to establish One-stop delivery services, "at not less than one physical center in each local area..." Therefore, we would have to create two more one-stop" sites. Again, all these added services with no increase in federal funding nor any state investment.

Thank you for the opportunity to comment. Please don't hesitate to contact me with questions if I can provide additional information.

Sincerely



Robert E. Schmidt  
Chair-Coastal Counties Workforce Board  
Human Resource Manager  
L.L. Bean Inc.

## Sardano, Timothy J

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**From:** Ryan Pelletier <RPelletier@nmdc.org>  
**Sent:** Tuesday, March 12, 2013 7:45 AM  
**To:** DOL, SWIB  
**Subject:** FW:  
**Attachments:** SCEC Letter 28 JAN 2013.pdf; LEAD Letter 28 JAN 2013.pdf

Please accept the attached letters as part of the current public comments being received regarding the proposed State WIA plan.

Thanks,

Ryan

---

**From:** Ryan Pelletier  
**Sent:** Monday, January 28, 2013 11:34 AM  
**To:** [swib.dol@maine.gov](mailto:swib.dol@maine.gov)  
**Cc:** [Oates.Jane@dol.gov](mailto:Oates.Jane@dol.gov); [OBrien.Holly@dol.gov](mailto:OBrien.Holly@dol.gov)  
**Subject:**

Good Morning:

Attached are two additional letters received today regarding the proposal State WIA Plan for submission as part of the public comment process.

Thanks,

Ryan

Ryan D. Pelletier, Director  
Economic & Workforce Development Division  
Northern Maine Development Commission

Executive Director  
Leaders Encouraging Aroostook Development Inc. (LEAD)  
Aroostook-Washington Workforce Investment Board (AWWIB)

PO BOX 779  
Caribou, ME 04736

(P) 207-498-8736  
(C) 207-551-0411

[rpelletier@nmdc.org](mailto:rpelletier@nmdc.org)

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Robert Tyler  
Indian Township Planning  
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Legislative Delegation

Chris Gardner  
Washington County  
Commissioners

January 28, 2013



State Workforce Investment Board  
120 State House Station  
Augusta, ME 04330

Dear SWIB:

The Sunrise County Economic Council (SCEC) has major reservations about several components of Maine's proposed Workforce Investment Act (WIA) plan, and would advise against changes that run counter to policies supported by the existing LWIBs and Chief Local Elected Officials.

Specifically, SCEC believes that the Aroostook-Washington LWIB is an invaluable resource that reflects the educational, economic, and workforce development needs of both of Maine's rural, northeastern counties. In 2010 our Council supported the re-alignment of Maine's federally-recognized economic development districts in an effort to achieve just that. (Aroostook and Washington counties also share the same USDA Rural Development zone.)

Realigning LWIBs now would undermine progress the two counties have made on all three fronts – economic development, education and workforce development at a time when Maine businesses, educators, and job creators need to be in sync locally, regionally, and statewide. Nowhere is this more evident than in Aroostook and Washington counties, both of which share limited resources, similar dynamics, and a continued willingness to work together across traditional lines to achieve a better quality of place.

Modifying the state's workforce development regions would also discourage involvement and innovation at the grassroots level, particularly in Aroostook and Washington counties where "local control" is a hot-button issue to say the least. The current LWIBs ensure that local people have a voice in directing how workforce investment resources are allocated in their own back yard. And that is important in rural areas where community buy-in can be the biggest obstacle to effectiveness.

SCEC is fully behind Maine's LWIBs. We stand united with the Northern Maine Development Commission (NMDC), and each of Maine's economic development districts, who oppose the state's proposed WIA plan.

SCEC asks you to deny any request to re-designate the LWIBs without first consulting with the LWIBs themselves. Each LWIB is in a unique position to assess the educational, economic and workforce development needs of its member businesses and communities while providing one-of-a-kind resources to students and workers in its service area. Reorganizing the LWIBs now would put the Aroostook-Washington region – and others across the state – back at square one, at a time when Maine's economy needs strong, stable, and steady leadership.

Please contact me if you have any questions.

Sincerely,

Harold Clossey  
Executive Director  
Sunrise County Economic Council

# LEADERS

Encouraging Aroostook Development

January 28, 2013

S.W.I.B.  
SHS 120  
Augusta, ME 04330

Leaders Encouraging Aroostook Development (LEAD) Inc. is a non-profit corporation, established in 1986 as a Regional Chamber of Commerce. LEAD is a voluntary membership organization of businesses, educational institutions, communities and private citizens in Aroostook County.

LEAD strongly supports the current workforce investment act local area designation and is committed to ensuring that the proposed State of Maine WIA plan that has been presented by the State Workforce Investment Board be denied.

LEAD supports the Chief Local Elected Officials of Maine in voicing its strong opposition to the proposed plan and respectfully asks the United States Department of Labor to deny any request or proposal that changes the local area designation and programmatic oversight of workforce investment act funding currently under the purview of the Aroostook-Washington Local Workforce Investment Board.

Sincerely,



Jim Davis, Vice-President  
Leaders Encouraging Aroostook Development

## Sardano, Timothy J

---

**From:** Ryan Pelletier <RPelletier@nmdc.org>  
**Sent:** Tuesday, March 12, 2013 7:53 AM  
**To:** DOL, SWIB  
**Subject:** FW: State of Maine WIA Plan Public Comment  
**Attachments:** APP Letter 25 JAN 2013.pdf

Please include the attached letter as part of the public comments received regarding the proposed state WIA plan.

Thanks,

Ryan

---

**From:** Ryan Pelletier  
**Sent:** Friday, January 25, 2013 1:45 PM  
**To:** [swib.dol@maine.gov](mailto:swib.dol@maine.gov)  
**Cc:** [Oates.Jane@dol.gov](mailto:Oates.Jane@dol.gov); Otis Smith  
**Subject:** State of Maine WIA Plan Public Comment

Attached please find a letter from the Aroostook Partnership for Progress regarding Maine's proposed State WIA Plan.

Ryan D. Pelletier, Director  
Economic & Workforce Development Division  
Northern Maine Development Commission

Executive Director  
Leaders Encouraging Aroostook Development Inc. (LEAD)  
Aroostook-Washington Workforce Investment Board (AWWIB)

PO BOX 779  
Caribou, ME 04736

(P) 207-498-8736  
(C) 207-551-0411

[rpelletier@nmdc.org](mailto:rpelletier@nmdc.org)



A public-private partnership committed to economic growth in Northern Maine

January 25, 2013

SWIB

SHS 120

Augusta, ME 04333

The Aroostook Partnership for Progress (APP) is a private sector led organization that drives economic development in Northern Maine. The mission of APP is to grow the economy by growing business opportunities, creating jobs, marketing the region and ensuring The County has a skilled and trained workforce to meet the needs of our industries and businesses.

The APP works closely with the Aroostook-Washington Local Workforce Investment Board on a variety of workforce related projects. Recently, one of these initiatives, the Aroostook County Jobs Projection project helped determine available jobs in the coming years and also helped identify the skills and education requirements our students will need to fill those jobs. The purpose of this effort is to help stem student outmigration, inform high school students of these opportunities and to attract former Maine residents back to Aroostook County to aid local businesses with an aging workforce.

The Local Workforce Investment Board has provided valuable resources and information to assist in this very important economic and workforce development initiative. We believe strongly that the County Commissioners' current position of designated local areas makes the most sense for our State and for our region. It is for these reasons that the private sector leadership in Aroostook County opposes the proposed state WIA plan and encourages the United States Department of Labor to deny the plan.

Thank you for the opportunity to provide public comment and we look forward to maintaining our relationship with the Aroostook & Washington Local Workforce Investment Board in the future.

Sincerely,

A handwritten signature in black ink that reads 'Robert Dorsey'. The signature is written in a cursive style with a long, sweeping underline.

Robert Dorsey, President/CEO  
Aroostook Partnership for Progress

## **Sardano, Timothy J**

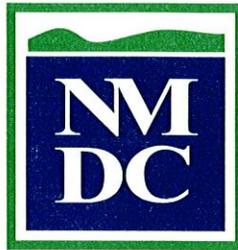
---

**From:** Ryan Pelletier <RPelletier@nmdc.org>  
**Sent:** Tuesday, March 12, 2013 8:06 AM  
**To:** DOL, SWIB  
**Subject:** Public Comments  
**Attachments:** NMDC Letter 29 JAN 2013.pdf; MEDDA Letter 29 JAN 2013.pdf

Attached please find two letters regarding the proposed State WIA plan. Please include with public comments.

Thanks,

Ryan



## Northern Maine Development Commission

January 29, 2013

State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

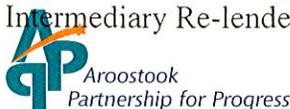
Dear Chairman Webber:

Northern Maine Development Commission is opposed to the realignment of Workforce Investment Areas as proposed in Maine's Workforce Investment Act Strategic Plan for 2012-2016.

On October 10, 2010 A proposal to Make Comprehensive Adjustments to the Boundaries of Maine Economic Development Districts (EDDs) (attached) was submitted by Governor Baldacci and subsequently endorsed by Governor Paul LePage. The proposal received 57 letters of support from around the state and the US Department of Commerce Economic Development Administration (EDA) approved the realignment in early 2011. This realignment addresses Maine's new economic landscape with an emphasis on regional economies and the need to balance population with resources which in turn creates a stronger economic development delivery system across the state.

This realignment moved Washington County from the Eastern Maine EDD to the newly realigned Aroostook/Washington EDD which is also the same geographical boundary for the current Local Workforce Investment Area, the federal Jobs, Innovation and Accelerator Challenge, GroWashingtonAroostook Sustainable Communities Planning Program, USDA Rural Development Service Delivery Area, EDA Comprehensive Economic Development Strategy (CEDS) and Mobilize Northern and Downeast Maine Initiative. The LWIB serves as the CEDS board for both Aroostook and Washington Counties. The EDD realignment was based on common economic realities, common rural attributes, resources available and Mobilize Maine regional goals and capacity.

NMDC provides a wide range of economic and workforce development services in the Aroostook/Washington Workforce Investment Area (AWWIA) and holds the following designations: Maine Regional Planning Commission, Aroostook County Tourism, USDA Rural Empowerment Zone, US Department of Defense Procurement Technical Assistance Center sub-recipient, NIST/Maine Manufacturing Extension Partnership sub-recipient, SBA/Maine Small Business Development Center, SBA Micro-loan lender, US Department of Commerce EDA Designated Economic Development District, US EPA Brown-fields Assessment and Re-lender, Maine DOT Rural Transportation Planning Organization, US Census Data Center Affiliate, and an Intermediary Re-lender for the Finance Authority of Maine, US Department of Agriculture



Equal Opportunity Lender/Agency

[www.nmdc.org](http://www.nmdc.org)

11 West Presque Isle Rd., PO Box 779, Caribou, ME 04736

Voice: (207) 498-8736, Toll Free in ME: 1-800-427-8736, Fax: (207) 493-3108, TTY: (207) 498-6377

Rural Development, and US Small Business Administration. In addition NMDC provides management and clerical support to the Northern Maine Finance Corporation, Aroostook County Tourism, Aroostook/Washington Workforce Investment Board, Aroostook Partnership for Progress, Northern Maine Solid Waste Management Committee, Leaders Encouraging Aroostook Development, Fiscal Agent for the 2014 World Acadian Congress, Aroostook Investment Exchange, several municipal revolving loan funds and the Aroostook Municipal Association. All of these organizations are located at NMDC's offices in Caribou, Maine. The AWWIA has an extensive and effective network and partnership in place that fosters communication, joint ventures, partnering in funding applications, and leveraging each other's assets and resources. NMDC contracts with Sunrise County Economic Council located in Machias in Washington County to provide services in that region for workforce development, business assistance, jobs accelerator projects and the Mobilize Downeast Maine initiative.

The Aroostook Partnership for Progress, Leaders Encouraging Aroostook Development and Sunrise County Economic Council are privately led, privately controlled and privately funded organizations that work closely with the LWIB in fostering local industry input into workforce and economic development throughout the two county region. None of these organizations, nor NMDC itself, was consulted or asked for input in developing the statewide plan. Too often we see a "one size fits all, top down" approach to workforce and economic development when in fact people at the local and regional level that have been working closely together for years and achieving success are moved around like chess pieces without regard to the effects public policy can have on them.

Aroostook and Washington Counties need to be in the same local workforce area for all the reasons stated above. The statewide plan does not make a compelling case at all to realign the LWIAs in northern and eastern Maine.

Thank you for your consideration of our request and I look forward to further discussion if you have any questions.

Sincerely,



Robert P. Clark  
Executive Director

Attachment: EDD Realignment Report



**Maine  
Economic  
Development  
District  
Association**

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Androscoggin Valley Council of Governments; Eastern Maine Development Corporation;  
Greater Portland Council of Governments;  
Kennebec Valley Council of Governments; Mid-Coast Council of Governments;  
Northern Maine Development Commission; Southern Maine Regional Planning Commission

January 29, 2013

State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Chairman Webber:

The Maine Economic Development District Association (MEDDA) requests that the seven Economic Development Districts be included in the statewide plan by virtue of their regional Comprehensive Economic Development Strategy plans and working closely with the LWIBS for aligned workforce and economic development strategies and cluster initiatives.

MEDDA was formed in 1994 and is comprised of the seven US Department of Commerce Economic Development Administration (EDA) federally designated Economic Development Districts in Maine, as depicted in our letterhead.

Each EDD is required to develop a Comprehensive Economic Development Strategy (CEDS) for their respective regions which will support communities and regions in their comprehensive, entrepreneurial, and innovation-based economic development efforts. Resulting in increased private investment and higher-skill, higher-wage jobs in areas experiencing substantial and persistent economic distress and enhance the competitiveness of regions.

The geographical boundaries of the EDDs were changed by EDA, upon recommendation of Governor Baldacci and endorsement of Governor Paul LePage, in 2011. The Maine Department of Economic and Community Development worked with the EDA Regional Representative to put together a stakeholder working group to study the issue. The group reviewed the requests and available data, and developed a draft recommendation. The Department then held regional public meetings on the draft in Machias and Belfast, two areas where significant changes were proposed. As a result of the input from those meetings, the working group made adjustments to the proposal (See Attached MEDDA Coverage map).

The working group established the following principles for use in preparing the draft proposal. The new arrangement should:

1. Build capacity: Ensure that each district has a sufficient population and economic base to be able to generate local resources for economic development;
2. Coordinate with other regional boundaries: Overlap with existing regional planning and program boundaries wherever possible – in order to reduce confusion among local officials, and to make it easier to jointly administer programs such as workforce development and economic development;
3. Reflect economic realities: Bring together areas with common economic characteristics; and
4. Reflect local preferences: Follow the natural economic and political lines of communication already in use by local officials in the regions.

EDD's in Maine provide significant services to businesses and communities such as providing loans to businesses, business development assistance, governmental contracting for businesses, technical assistance to manufacturers, GIS mapping, land use planning, transportation planning, project development and monitoring, leveraging private and public financial resources, economic and community development planning and implementation, and workforce training and development to name a few of the services provided. The major economic development players in the state have not been included in the state plan in a meaningful way.

The EDDs in Maine serve all 495 communities covering some 30,865 square miles, they employ over 160 people in many different fields, provide professional expertise on a wide range of topics, operate total loan fund portfolios in excess of \$36 million, and have annual operating budgets in excess of \$25 million.

The EDDs in Maine have not been asked to participate in developing the state plan and when offered were denied. A significant amount of work, analysis, and thought has been expended over the past 2 years to make sure that boundary realignment of the EDDs would result in a more efficient and productive economic development delivery system.

Thank you for your consideration of MEDDA's comments regarding the state plan. If you have any questions or need additional information please feel free to contact me at any time.

Sincerely,



Robert P. Clark  
President

# PENQUIS

Helping Today • Building Tomorrow

March 12, 2013

State Workforce Investment Board  
State House Station 120  
Augusta, Maine 04333

To Whom It May Concern:

I am writing to reiterate Penquis' opposition to the State Workforce Investment Board's Plan. The revisions to the earlier plan have done nothing to address the concerns expressed in my earlier letter which stated:

"As President and Chief Executive Officer of Penquis C.A.P., Inc., I serve as a member of the Tri-County Local Workforce Investment Board (TCLWIB), I am a member of the Bangor Chamber of Commerce and my organization frequently partners with Eastern Maine Development Corporation. I am very aware of the high quality and quantity of workforce development services provided in our region.

Just as I opposed the previous Plan and waiver request, I am opposing this proposed Plan because the State of Maine has failed to do the groundwork necessary to ascertain that the current system needs improving and that the new system can accomplish that.

Communication and opportunity for input by the Chief Local Elected Officials (CLEOs), the LWIBs, the workforce development community and the Chambers of Commerce have not secured support for the proposed plan in this region.

The local Chamber does not support the Plan and has not agreed to participate in the fashion anticipated in the plan.

In particular, the Chief Local Elected Officials continue to express their frustration with a process that has ignored local input.

The LWIBs are opposed and feel the entire assessment of the current system's cost and performance is based on incorrect information and misinterpretation.

Without these groups' full engagement in the Plan development process, without their input and solid agreement on the facts, the assumptions and the new roles that are envisioned, the Plan will fail.

The victims of that failure will be the people who are being successfully trained and placed in jobs by the current system and the businesses that rely on the current system to provide them with trained, skilled workers.

Given the process that has been followed in the Plan development, Maine will be better served if the Plan is denied until a more legitimate, inclusive process that seeks and wins local and regional support is followed."

Because the state has not addressed these concerns, Penquis' opposition continues.

Sincerely,



Charles Newton  
Chief Executive Officer

---

262 Harlow Street (207) 973-3500  
PO Box 1162 Fax (207) 973-3699  
Bangor, Maine 04402 TDD (207) 973-3520  
www.penquis.org 1-800-215-4942

## Sardano, Timothy J

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**From:** Brian Hodges <bhodges@camdenmaine.gov>  
**Sent:** Tuesday, March 12, 2013 8:56 AM  
**To:** DOL, SWIB  
**Subject:** public comment  
**Attachments:** PublicCommentSWIB.pdf

I wish to resubmit my prior comment regarding the WIA Strategic Plan. Attached is the resubmission.

Brian S. Hodges, Development Director  
Town of Camden  
29 Elm St  
Camden, ME 04843  
(207) 236-3353  
[www.camdenmaine.gov](http://www.camdenmaine.gov)  
[www.freelandinmaine.org](http://www.freelandinmaine.org)  
[www.facebook.com/CashMobCamden](http://www.facebook.com/CashMobCamden)

## Sardano, Timothy J

---

**From:** Ryan Pelletier <RPelletier@nmdc.org>  
**Sent:** Tuesday, March 12, 2013 9:12 AM  
**To:** DOL, SWIB  
**Subject:** WIA Strategic Plan

To Whom It May Concern:

My name is Ryan Pelletier and I currently serve as the Director of Economic & Workforce Development at Northern Maine Development Commission and also serve as the Executive Director of the Aroostook-Washington Local Workforce Investment Board.

Please accept the following as my comments regarding the most recent revisions to the proposed WIA Strategic Plan for the State of Maine. I understand that the plan was submitted to US DOL in late January and all previous comments submitted at that time have also been included as part of the plan that was previously submitted.

In regards to the most recent revisions:

1. The public comment period offered by Maine DOL and the State Workforce Investment Board is insufficient. A three working day period does not provide ample time to Maine's businesses; economic development and workforce development officials and our chief local elected officials in the local areas, to properly review the entire plan and provide meaningful and purposeful feedback. This process should provide for ample opportunity to engage the very stakeholders that the plan eventually aims to serve. It is a disservice to the people of Maine when very little time is allowed to provide feedback and comments.
2. The fact still remains that this plan and the most recent proposed revisions have been developed without consultation with Maine's Chief Local Elected Officials. Until such time as they have been given an opportunity to provide feedback and engage in a true dialogue regarding Maine's workforce development system, proposed changes to local areas, and all other issues regarding a strategic plan for the State of Maine, the US Department of Labor should reject the plan.
3. The revisions propose that the plan be submitted and then once approved, the State Workforce Investment Board and Maine Department of Labor will engage in a dialogue with the Chief Local Elected Officials. That dialogue and further consultation needs to be happening **BEFORE** a plan is approved. In fact, the consultation should occur **BEFORE** a plan is even submitted.
4. The plan continues to include reference to Chamber of Commerce regions in Maine. In local area 1, this has huge implications. While one of our counties falls within one so-called chamber region, another county in our local area does not. In effect, this plan and the configuration of the local areas proposed along chamber regions divides our two county local workforce investment area. I am opposed to this for several reasons. Mainly, these two counties share the same federal designation area for the economic development district as designated by the US Department of Commerce Economic Development Agency. This same area also includes the local service delivery area for the United States Department of Agriculture Rural Development Agency. Our Comprehensive Economic Development Strategies are based on these two counties working together as one region to better serve our business community and our unemployed. This strategy, being developed for our two county region by our Local Workforce Investment Board, is engaging in asset based cluster development; entrepreneurship and innovation; linking education to industry and workforce development; access to capital to assist our businesses to grow and create jobs, infrastructure and the environment and finally leadership. The success of these strategies depends on bottom up economic development not a one size fits all, top down approach.

Thank you for your time and consideration. Please feel free to contact me at 207-498-8736 if you have any questions or need further information.

Sincerely,

Ryan D. Pelletier, Director

Economic & Workforce Development  
Northern Maine Development Commission

Executive Director  
Aroostook-Washington Local Workforce Investment Board

Office of:

Town Manager  
Tax Assessor  
Tax Collector  
Town Clerk  
Treasurer  
Code Officer  
Finance Director  
Harbor Clerk



Town Office

P.O. Box 1207  
29 Elm Street  
Camden, Maine 04843  
Phone (207)236-3353  
Fax (207)236-7956  
<http://www.camdenmaine.gov>

January 29, 2013

Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Chairman Webber,

I am writing to comment on the 2012 State Workforce Investment Act (WIA) Plan. It is my understanding that a proposed strategy is to increase the number of Local Workforce Areas from four to eight throughout the state of Maine, and align these 8 areas with the Maine Tourism and Chamber of Commerce regions. It is also my understanding that according to the WIA, each Local Workforce Area must have a Local Workforce Investment Board (LWIB) and a One Stop Center located in any designated Local Workforce Area.

Currently approximately \$2.5 million dollars of WIA formula funds is being allocated annually to the Coastal Counties Workforce Area, comprised of six counties. Since Coastal Counties Workforce, Inc (the agency that staffs the LWIB) is limited to 10% of the allocated funds, roughly \$250,000 is used to support the efforts of the LWIB. Should this current local area be divided into 3 local areas, then two more LWIBs would need to be created. Since only 10% is allowable for administration, the \$250,000 would have to support three times the work. In addition, two more One Stop Centers would need to be put in place in order to be compliant with federal law. Having a larger number of local areas and One Stop Centers would seem to increase the costs and resources needed, not save.

The Mid Coast Economic Development District (MCEDD) is one of 7 regional economic development organizations endorsed and supported by the US Economic Development Administration (EDA), Maine Department of Economic & Community Development, and the Governor's office. Coastal Counties Workforce Inc has a similar geographic coverage area as the MCEDD. Both organizations play a vital role in bolstering Maine's economy. Rather than dismantle the current structure, an opportunity seems to present itself by having the LWIBs and EDDs strengthen their partnerships. This also keeps the focus of workforce training on a more general and open basis. While tourism is an important element of Maine's economy, we should not place an exclusive emphasis on it. Also, Chambers of Commerce play a vital role across the state but are paid membership organizations. It would not seem prudent to have federal workforce funds directly connected to entities that are driven by a dues based membership. Here in the midcoast, our economic development organizations and offices are proud of our existing and effective relationship with our Chamber of Commerce. They are consistently a part of the conversation involving economic and workforce development.

I respectfully request you take these points into consideration. If I can answer any questions, please don't hesitate to contact me.

Sincerely

A handwritten signature in black ink that reads "Brian S. Hodges".

Brian S. Hodges  
Camden Development Director  
Coastal Counties Workforce Inc, Board of Directors  
Mid Coast Economic Development District, Board of Directors

**Sardano, Timothy J**

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**From:** Michael Aube <MAube@emdc.org>  
**Sent:** Tuesday, March 12, 2013 10:22 AM  
**To:** DOL, SWIB  
**Subject:** Comments regarding SWIB Plan  
**Attachments:** SWIB2.doc; EMDC Letter re SWIB 1-2013.pdf

I have attached two letters for comment in regards to the State Workforce Investment Board (SWIB) plan.



Michael W. Aube  
President

A handwritten signature in black ink that reads 'Michael W. Aube'.

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40 Harlow Street Bangor, ME 04401  
207.942.6389 1.800.339.6389  
Fax 207.942.3548

March 12, 2013  
Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Mr. Webber:

I am offering comments regarding the "revised" State Workforce Investment Board (SWIB) plan posted to the "SWIB" website on March 7, 2013.

Specifically, I want to offer my strong concern that the selected eight chamber regions do not represent a common "economic region." These geographic areas were developed as focused regions within Maine to provide a vibrant marketing strategy for fulfillment of tourism related activity. Certainly, tourism is a significant contributor to Maine economy, however, these regions do not represent a well-defined economic region based upon transportation systems, common economic clusters and mutual workforce and educational activities.

In 2009, Maine's "economic development districts" as designated by the U.S. Department of Commerce, Economic Development Administration, completed an analysis in cooperation with Maine's Department of Community and Economic Development (DECD). These conclusions were approved by Governor Baldacci and Governor LePage and has resulted in a more robust and collaborative effort to advance Maine's economic base of small business and value added operations.

If it is the aspiration of the SWIB that the Chambers of Commerce participates more actively in the design, development and delivery of economic and workforce development in Maine, then that goal will be achieved with more meaningful result, if it is based on business growth opportunities and sector development, rather than regions premeditated around lighthouses, moose or lobsters.

Thank you,

A handwritten signature in cursive script that reads "Michael W. Aube".

Michael W. Aube, President/CEO

Eastern Maine Development Corporation





40 Harlow Street Bangor, ME 04401  
207.942.6389 1.800.339.6389  
Fax 207.942.3548

January 29, 2013

Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Mr. Webber:

On behalf of the Board of Directors of Eastern Maine Development Corporation (EMDC), I am expressing opposition to the proposed State Workforce Investment Board (SWIB) plan for the following reasons:

1. As an organization, we have made repeated attempts to provide the SWIB with information about the EMDC model for workforce and economic development. Each time we were denied access to sharing ideas, concerns and presenting the results of our efforts.
2. As a significant deliverer of services to small businesses, such as business counseling, financing opportunities and access to market opportunities, EMDC and its service region have not been engaged in any meaningful way in discussions regarding the proposed plan and the effect it would have on the businesses we serve.
3. As the U.S. Department of Commerce, Economic Development Administration, designated agent to develop a regional based Comprehensive Economic Development Strategy (CEDS), we have modified our process to fully engage the current Local Workforce Investment Board (LWIB) as the vehicle for the development of actions to maximize workforce development opportunities. The proposed SWIB plan makes no mention of this nationally recognized practice.
4. EMDC strongly believes that local and regional private sector leadership is the appropriate governance structure for workforce development.

Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Michael W. Aube'.

Michael W. Aube  
President  
Eastern Maine Development Corporation

## Sardano, Timothy J

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**From:** editor@thecryeronline.com  
**Sent:** Tuesday, March 12, 2013 10:29 AM  
**To:** DOL, SWIB  
**Cc:** Mike Bourret; chris@coastalcounties.org  
**Subject:** Coastal Counties Workforce, Inc. CLEO LETTER opposing current Maine DOL WIA plan changes  
**Attachments:** CCWI CLEO State WIA Plan Comments Jan 2013.pdf

Attached is the public comment from the Chief Local Elected Officials of Coastal Counties Workforce, Inc. - this is the same letter as originally submitted with the revised Maine DOL Plan. In respect to the March 7th proposed changes our position has not changed. Charles Crosby, CLEO and President of Coastal Counties Workforce, Inc. - please confirm receipt of this E-mail before 5 p.m. today.

Sent from my U.S. Cellular BlackBerry® smartphone

-----Original Message-----

From: "Chris Dube" <[chris@coastalcounties.org](mailto:chris@coastalcounties.org)>  
Date: Tue, 12 Mar 2013 07:54:55  
To: Charles Crosby<[editor@thecryeronline.com](mailto:editor@thecryeronline.com)>  
Cc: <[director@coastalcounties.org](mailto:director@coastalcounties.org)>  
Subject: CCWI CLEO LETTER

CLEO letter - I think this is the one you are requesting.

Christine Dube, Executive Assistant

CCWI

14 Maine Street, Suite 203A

Brunswick, ME 04011

Tel/Fax: 207-725-5472

Cell: 207-837-5699

[www.coastalcounties.org](http://www.coastalcounties.org)

Your partner in business development and economic prosperity...



**COASTAL COUNTIES  
WORKFORCE, INC.**

*Your partner in business development  
and economic prosperity...*

January 25, 2013

Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Mr. Webber:

29 CFR § 2831 (a)(1)(A)(ii) of the Workforce Investment Act provides direction on the process to be used in the designation of local workforce investment areas. The Act states “the Governor of the State shall designate local workforce investment areas within the State – (ii) after consultation with chief local elected officials... ”.

After the USDOL denied the State of Maine’s WIA Plan and Waiver Request in November 2012, the State was directed to re-write its WIA Plan and to consult with the CLEOs and the LWIBs on the new State plan. It appears that the state staff began rewriting the State plan immediately, and consultation with the CLEOs did not occur. In fact, the CLEO’s learned of the new State “local area designation strategy” along with the rest of the State of Maine when the redrafted state plan was posted on the SWIB website late on 1/18/13.

Furthermore, the Workforce Investment Act (see 29 CFR § 2831 (a)(1)(B)(v)) provides that in designating areas, the Governor must take into consideration, amongst other things, “[t]he resources of such local areas that are available to effectively administer the activities carried out under this subchapter,” i.e., local workforce investment area WIA responsibilities.

Ironically, in the Sept. 2012 WIA Plan submitted, the Governor sought cost savings by creating a system whereby the State Workforce Investment Board would “carry out the roles and functions of the Local Workforce Investment Boards, required by the Workforce Investment Act, in the newly designated regions.” Per this Plan, this would have “...reduce[d] the administrative cost associated with the current LWIB structure. Any savings captured by reducing administrative costs would result in more of Maine’s citizens being served and more available funding for occupational skills Training. The premise in creating an eight region system with one administrative unit (i.e., the SWIB) was cost savings. Conversely, in the current 2013 WIA Plan being submitted, the Governor still puts forth a system of eight regions but, now more local workforce investment boards (LWIB) would potentially exist creating a system where costs are increased.

Adequate funding is a very real concern especially in light of consistent yearly decreases in WIA allocations and at a time when our population is made up of ever increasing long-term unemployed residents requiring more costly (i.e., longer term) services. For example, in our current Region—Area 4, according to the Governor's new plan there would now be three Chamber Regions i.e., three local areas and thus we would be required to establish three LWIBs. In addition, per WIA requirements at 29 CFR §2864, we would have to establish One-Stop Delivery Services, "at not less than one physical center in each local area...". Therefore, we would have to create two more One-Stop" sites. Again, all these added services with no increase in federal funding nor any state investment.

Although it is true that there is a provision for CLEOs to "choose to stay aligned with their current Service Delivery Area" (page 60, State WIA Plan redraft), it is quite clear throughout the plan narrative that the intention is that the eight new local areas would be created. Therefore, in order to come into compliance with federal WIA legislation, this edict requires, as previously stated, that two more LWIBs and two more one-stop centers must be created in the six counties of Waldo, Knox, Lincoln, Sagadahoc, Cumberland, and York. Thus, the implementation of this falls apart; rendering the plan simply not financially feasible.

For these reasons, we are opposed to the proposed State WIA Plan.

Sincerely,



Charles Crosby, CLEO Chair  
Sagadahoc County Commissioner



Sallie Chandler, CLEO Vice Chair  
York County Commissioner



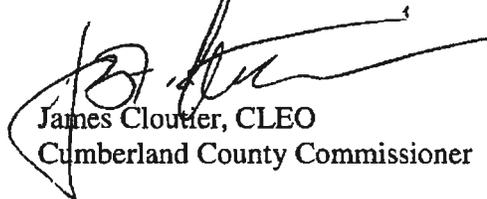
Betty Johnson, CLEO Secretary/Treasurer  
Waldo County Commissioner



Mary Trescott, CLEO  
Lincoln County Commissioner



Rick Parent, CLEO  
Knox County Commissioner



James Cloutier, CLEO  
Cumberland County Commissioner

**Sardano, Timothy J**

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**From:** editor@thecryeronline.com  
**Sent:** Tuesday, March 12, 2013 10:57 AM  
**To:** DOL, SWIB; Mike Bourret; chris@coastalcounties.org  
**Subject:** CLEO Chairs of State of Maine opposition letter to current Maine DOL proposed changes  
**Attachments:** ATT00001.htm; CLEO Letter 24 JAN 2013.pdf; ATT00002.htm

Public comment from Maine CLEO Chairs in opposition to Maine DOL plan changes - Charles Crosby, Coastal Counties Workforce, Inc. Chair

## Sardano, Timothy J

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**From:** Bonnie Fortini <bfortini@mmhs.u102.k12.me.us>  
**Sent:** Tuesday, March 12, 2013 12:19 PM  
**To:** DOL, SWIB  
**Subject:** Comment on WIA Strategic Plan recent revisions

To Whom It May Concern:

My name is Bonnie Fortini and I am currently a member of the Region 1 LWIB. These comments are being sent to you regarding Maine's recently revised WIA Strategic Plan, and I appreciate the opportunity to respond.

My specific concerns include the following:

1. The apparent speed and disconnect that continues to surround this plan, e.g. the brief window of opportunity to respond to recent revisions, of which I am now availing myself, and the lack of communications with the Chief Local Elected Officials (CLEO) as, I believe, is required, but which continues to be missing from the process.
2. The backward approach to plan development that seems to be considered logical though I do not understand how having consultations and discussions after the plan has been submitted can be seen as part of any sensible planning process. It feels too much like a *fait accompli* and lacking in the reasoned consideration it deserves with input from as many concerned individuals as possible and practical.
3. Organizing by Chambers of Commerce regions might make sense for some parts of the state, but there are parts of the state where economic development is much more closely aligned to the existing LWIB structure, and Region 1 is such a place. Our two counties are more similar in terms of resources/assets and needs/challenges than we are different, and the collaboration thus far has proven to be effective, efficient, and encouraging for future development. To force a realignment based on Chamber regions seems, at best, topographically reasoned, but would, in the case of Region 1 be counterproductive at least.

Thank you for the opportunity to weigh in on this matter. My concern is driven by not wanting to see an effective collaboration such as the one between Aroostook and Washington Counties be crippled or destroyed by a design that disregards individual needs. If you have any questions or concerns please contact me via email <[bfortini@msln.net](mailto:bfortini@msln.net)> or phone 255-0344.

Sincerely,

Bonnie L. Fortini, director Machias Adult & Community Education  
member- Region 1 LWIB & Youth Council

## Sardano, Timothy J

---

**From:** Rick Snow <rvsnow@myfairpoint.net>  
**Sent:** Tuesday, March 12, 2013 1:00 PM  
**To:** DOL, SWIB  
**Cc:** loris@maineindoorkarting.com; chall@portlandregion.com  
**Subject:** FW: SWIB

I am writing to support the plan of expanding the reach of Work force training from 4 to 8 regions and getting more input from the local chambers and business community. As a small business owner and member of the regional chamber I feel that because the current system is very narrowly focused, the businesses in Southern Maine are not getting the desired training they need. I have found that the Federal Government is focused on the big employers in the area but provide little or no help to the small businesses which make up the lion share of employment in Maine. I did receive some help in the initial development of my business from the SBA and would like to see the focused use of scarce tax dollars the plan identified. This plan would create a lot more opportunities for Maine's diverse business climate and focus attention on the 8 regions instead of the current 4 LWIBS.

Sincerely,

Richard V. Snow  
Owner  
Maine Indoor Karting  
23 Washington Avenue  
Scarborough, Me 04074  
207-885-0058

## Sardano, Timothy J

---

**From:** Chris Dube <chris@coastalcounties.org>  
**Sent:** Tuesday, March 12, 2013 2:19 PM  
**To:** DOL, SWIB  
**Cc:** webberonsebago@msn.com; Paquette, Jeanne; Oswald, Garret J.  
**Subject:** CCWI Public Comment Letters on State WIA Plan  
**Attachments:** CCWI-public-comments-1-28-13.pdf; CCWI Comments 3-12-13.pdf

Garret,

Please find attached both CCWI's January, 2013 and current (March, 2013) public comments to the recently revised proposed WIA State Plan for inclusion into the public record.

Thank you,

Christine Dube, Executive Assistant

CCWI

14 Maine Street, Suite 203A

Brunswick, ME 04011

Tel/Fax: 207-725-5472

Cell: 207-837-5699

[www.coastalcounties.org](http://www.coastalcounties.org)

Your partner in business development and economic prosperity...



MEMO

To: Mr. Fred Webber, SWIB Chair  
From: Michael Bourret, CCWI Executive Director *MB*  
Re: Coastal Counties Workforce, Inc.'s Comments on WIA State Plan.  
Date: January 28, 2013

**I. LePage Plan's Return on Investment (ROI) Strategy:**

Return on investment or ROI is a theme in the Governor's new plan. Although an essential tool in private business endeavors i.e., considering profits in relation to capital invested, ROI calculations for the social service arena brings with it great complexity. This complexity or level of thorough analysis is missing from the State's proposed WIA Plan despite the fact the Plan weighs in so heavily on this argument in order to justify the Governor's systemic changes i.e., four local areas to eight.

The definition and calculation of ROI depends on what you include as costs and returns. However, the State WIA Plan does not include costs or returns, nor does it include solid metrics (or inputs). Unfortunately, the State's attempt at explaining their ROI basis is inadequate; therefore, the ROI language in the State's Plan is nothing more than shallow rhetoric.

At a time when WIA resources are decreasing, going to eight areas i.e., 100% increase in areas, means using system resources to augment the administrative capacity needed to oversee the additional areas. This is true for both the State and local systems required to establish, oversee and monitor the additional areas. The State's Plan excludes any cost analysis and does not even speak to additional costs of implementation.

The State's Plan completely overlooks the two essential elements that come along with the creation of additional local areas: the required additional local workforce investment boards (LWIBs) (see 29 CFR § 2832) and the additional One-Stop delivery centers (see 29 CFR § 2864).

29 CFR § 2832 makes it clear that in each local area of a State...certified by the Governor...a local workforce investment board must exist. Therefore, since the current plan calls for eight areas, there would now have to exist eight LWIBs. Given the oversight and administrative capacity needed to administer an LWIB, these additional four LWIBs are not feasible without additional financial resources to hire additional staff.

Moreover, 29 CFR § 2864 mandates that at a minimum, the one-stop delivery system—(A) shall make each of the programs, services, and activities described in paragraph (1) accessible at not less than one physical center in each local area of the State. (Emphasize added). Since the new proposed State WIA Plan now establishes eight areas, we read § 2864 to require eight One-Stop Centers.

What this means for our local area for example, is that where we now have one One-Stop Center (in Portland) we would have to have three since our current area would be comprised of three chamber regions—local areas. Again, without additional financial system resources, we simply cannot increase from one to three One-Stop Centers. In addition, we do not have control over requiring the other one-stop partners to augment their delivery presence in these additional centers.

For all these reasons, non-existent ROI analysis despite the rhetoric, increased administrative costs in establishing the additional LWIBs and additional system costs in augmenting the number of One-Stop Centers, the Governor’s plan fails to be feasible.

## **II. Chamber Plan Strategy is Vague and Undefined:**

As we mentioned in our first comment letter, we do not disagree with the utilization of Chambers of Commerce as a vehicle for business outreach. But for all the emphasis the Governor’s Plan still places on Chambers i.e., creating local areas from chamber regions, it is interesting to note that the entire Workforce Investment Act regulations contain only one mention of Chambers.

Although there is some value derived from Chamber involvement, as there is for partnering with other business and industry groups, it certainly does not warrant creating four additional local areas in the State of Maine. This is especially true when there are no additional resources available to deploy this strategy.

In addition, despite the concept proposed by the Governor in the proposed WIA Plan, there is much ambiguity as to the real relationship the Chambers will play with local workforce investment boards (LWIBs). Importantly, there is also no information as to the cost of this endeavor.

Here are some of the contradictions or ambiguities which cause us concern:

1. Page 7: *Chambers will be reimbursed for expenses incurred to provide business input to the SWIB. Chambers will not become contractors, nor will administrative overhead be funded for them.*

There are no parameters for reimbursements or criteria—no maximums, etc. How can one propose a plan which involves reimbursement to approximately 70 entities statewide without a cost containment strategy or budget? How does one propose such a strategy without knowing what the overall cost for such engagement will be? How does one do a ROI analysis as suggested by the Governor’s Plan without such information?

2. Page 31: *The Maine Department of Labor is seeking funding to survey employers so we can identify occupations in which employers are persistently challenged to find staff.*

The Governor’s Plan puts forth the Chambers as “facilitators and conveners of business input”. Why is the MDOL seeking to perform the same work that was designated as one of the primary functions of Chambers?

3. Attachment 9: SWIB Policy (Chambers of Commerce as required partner in local workforce areas).

***Policy:***

*Local Workforce Investment Boards are required encouraged to contract enter into formal agreements, such as development of MOUs, with all of the local Chambers of Commerce and other business associations within their areas, to establish and maintain programs, services, and activities that engage employers in workforce development planning and connect them to workforce development services., especially Specifically, to ensure they are aware of and linked to the CareerCenters, with the outcome of increasing effective, business-led workforce development activities, including, but not limited to, employment of individuals in high wage and high growth occupations and industry- and business-responsive job training programs.*

*As part of the contracting formal agreement process, LWIBs and local Chambers will negotiate activities to be implemented by both parties. Any funds provided to the Chambers will not be considered training funds or supportive service funds (as defined in Policy #2013-01)*

There is so much confusion with the above policy and/or approach we are uncertain where to begin our commentary on point. For example: Are we being made to enter into contracts or formal agreements alone? What is the definition of a formal agreement? Are these requirements mandated on all 22 chambers in our area along with business associations in our area? How many business associations? What are the “any funds” provided to Chambers referring to? Page 7 of the Plan stated that no “administrative overhead” would be spent on them. How will the MDOL “monitor” us for compliance? What are the criteria on which LWIBs will be evaluated to determine “penetration”? (See pages 7, 19, 113 of the proposed Plan.)

Lastly, in addition to all the lacking information regarding cost, the proposed WIA Plan fails to provide the mechanism as to what to do with all the information gathered by the increased market “penetration” by Chambers. As a result, the Chamber ‘idea’ is missing the operational component. It is therefore not possible to comment on its viability.

*Note: Italicized language in this section reflects MDOL/Governor proposed Plan or policy language*

**III. LePage’s Plan Calls for Quantity over Quality:**

The Plan appears to suggest that to be cost effective, CLEOs should collectively look to hire only one or at least less than the current four administrative entities to oversee multiple Local Areas and multiple LWIBs. By suggesting that the same 10% administrative funds can now support up to eight LWIBs with the same staff capacity is simply ludicrous. Maine actually receives less WIA funds today than it did in 2000.

In order to ensure that all elements of WIA administration are met and that they are met at a high level of diligence, the administrative funding allowed by WIA must not be compromised no matter what the alternate intended use(s) may be. In order for a Local Area to avoid sanctions and auditing problems, etc., adequate staffing capacity is paramount. After 13 years of workforce delivery in Maine, it is quite clear that none of the four current Local Areas are flush in administrative resources.

That is why in 1999 when the first State Workforce Investment Act Plan was written, the State advocated that the CLEO not only take an active role in the oversight for WIA but also be actively linked

to both the LWIB activities and staffing. Because of this natural functional alignment and limited administrative funds the State recommended the CLEO's agreement to ONLY four Local Areas.

Although the LePage Administration fails to recognize any of the good work that is occurring locally, the Local Areas are able to engage their respective majority private sector board members in a manner that results in viable workforce strategies, providing real solutions to vexing workforce challenges.

If local staff are required to manage up to eight LWIBs, the depth of engagement with board members on the multitude of workforce issues facing a local area will suffer. Board staff will be relegated to job duties that are usually reserved for administrative assistants. Setting up meeting dates, finding locations, providing public notices, writing and distributing minutes etc.; but, the development of goals, strategies and action steps will suffer as a result. In addition, there will be no capacity for local staff to spend time on seeking supplementary, albeit important workforce grant funds such as federal discretionary solicitations.

Simply put, there is no rational reason to double Maine's Local Workforce Areas and respective infrastructure.

#### **IV. New Local Area Design:**

Per the proposed WIA plan, page 59, it states, *"The existing local areas were ...not based on particular regional economies or workforce assets such as colleges or universities"*. This is simply not true.

In 1999, the State Workforce Investment Board (MDOL staff) worked directly with Board members and CLEOs as they jointly came to agreement on the local area designation. This agreement was reached through a series of meetings and over a number of months where maps from the Department of Education, Regional Economic Development Districts, Department of Health and Human Services, Maine's Colleges and Labor Market Areas were made available for consideration and review. MDOL Labor Market Analysts and other economists lent their expertise to this review, so the homework was done and ultimately resulted in USDOL approval.

It is ironic that the Plan suggests that the eight Chamber Regions are somehow more representative of regional economies than the current Local Areas. With one county as an exception, the eight Chamber Regions fall squarely into the current four Local Areas. The issue here is not the geography, despite the claims made in the Plan. The issue is one of affordability. If the Maine WIA Allocation were two to three times what it is today, perhaps we would have the luxury of breaking down the Local Areas even further. However, since this is not the case, the choice on jurisdictional boundaries needs to be balanced by actual resources. This simply begs the question: Why redraw the lines at all?

#### **V. Lack of Involvement & Flawed Process:**

Throughout the redrafted WIA Plan it is once again stated that the Governor and his officials consulted with LWIBs & CLEOs. Although the State staff must have begun rewriting the State Plan immediately, consultation with the CLEOs did not occur. In fact, the CLEOs learned of the new State "local area

designation strategy” along with the rest of the State of Maine when the redrafted State Plan was posted on the SWIB website late on 1/18/13.

The LWIB Directors did attempt to engage the State on development of the new Plan via email. However, these requests for inclusion were ignored. Simultaneously, there were a number of SWIB policy workgroup meetings that were held during December, 2012 and January, 2013, for the purpose of developing seven State policies which were since integrated into the State Plan. This is particularly troublesome due to the fact that most policies were not complete. For example **The Certification of CareerCenter Policy** did not have any certified standards; **The Data Collection and Reporting Policy** didn't have performance scorecards; the **Approval of LWIBs** did not have approval standards; and, **Obtaining a Letter of Support ...Policy** had no criteria developed.

Unfortunately, the dates of these workgroup meetings were not readily publicized and this had a serious impact on LWIB attendance. The only two exceptions of attendance came about because a SWIB member, on their own cognizance, chose to forward an email to an LWIB Director.

Without the benefit of the LWIB Directors' expertise during policy development, MDOL drafted seven policies and unveiled them for approval at the January 18, 2013 SWIB meeting. One example of the adverse impact of such a myopic approach is the current lack of understanding of the implications should LWIBs be required to meet a 40% minimum training expenditure.

For instance, with respect to the **Minimum Training Expenditure Policy** there is negative impact of a 40% training requirement in PY13. There exists a threshold percentage on WIA training (according to national data, between 25%-35%) which if surpassed, places the integrity of the WIA program at risk. Once this threshold is exceeded, “structural” program damage is caused, adversely affecting service provision. WIA is a system which has a delicate mandated structure which must be kept in balance if it is to be in compliance and work effectively. One could think of it as three pronged: (1.) Staff to provide mandated “core” and intensive services; (2.) Infrastructure to provide access to services and systems for tracking and accountability; and, (3.) Training to address occupational skills. Note: in order for a client to receive paid training under WIA, core services must first be rendered which requires staff and infrastructure. A State cannot do away or diminish Core Services.

Without adequate infrastructure or staffing (structure), increasing training to 40% will impact quality of services and numbers served:

- Core and intensive services would be greatly reduced. These services include, but are not limited to, determining WIA eligibility, career assessment, referrals, career advice, resume and interviewing assistance, support services and assistance with job search. These services are a requirement of WIA.
- Quality of services and customers served would be reduced and the cost per individual would increase.
- WIA required performance outcomes would be in jeopardy. Services under WIA would be provided with little, if any, measurable outcomes and minimal to no control would be exercised over federal funds.

- Little or no workshops on training services, resume writing, interviewing, and basic computer would be offered. In addition, WIA service providers would not effectively organize, participate in and conduct job fairs, mentoring programs, job clubs and business outreach.
- WIA service providers would not be able to provide effective OJT services to businesses or individuals nor would the provider partner be able to work with area chambers of commerce and other agencies in mentoring youth, adult and dislocated workers.



March 12, 2013

Mr. Fred Webber, SWIB Chair  
State Workforce Investment Board  
State House Station  
Augusta, ME 04333

Dear Mr. Webber:

On January 28, 2012 CCWI submitted its comments to the State Workforce Investment Act Plan which was subsequently submitted to United States Department of Labor (USDOL) Employment & Training Administration, by MDOL, on or about January 31, 2012. We want our original public comments resubmitted into the public record and provide the following additional comments.

First, although we are encouraged that MDOL and SWIB leadership have been working with USDOL and received what is characterized as “feedback” on the “Maine’s 2012 – 2016 Workforce Investment Act Strategic Plan,” we are not in accord with the resolution being put forth by the state of Maine. As we have said in previous comment letters, and we remain steadfast in our opinion, Maine’s current four Local Workforce Investment Area structure should remain intact/unchanged.

We are not in accord with a plan that suggests that MDOL will work with the CLEOS only after USDOL approves the plan. Such dialogue must occur first, prior to. The Le Page plan’s sequence of events is completely misguided. Moreover, it is still inconsistent with WIA requirements of consultation and local area involvement as we have already stated in our previous comments. Since the local workforce investment areas and CLEOs have thus far been excluded, the plan submitted it not complete. It is senseless for USDOL to approve a state plan which is thus, undeveloped.

In addition, in order for any real resolution to occur, prior to the “workshops” being proffered by the state of Maine, the administration should clearly explain why a new configuration for Maine’s LWIBs is needed. What is the “it” that is trying to be rectified by a new LWIB structure? The Le Page plans have never been reconciled i.e., the first plan put forth a single state run workforce board and the second plan, an eight area or region (depending on the version) plan. Since both of the submitted Le Page WIA plans fail, in our opinion, to articulate a coherent reason and sound approach, obtaining this information prior to “workshops” would help us prepare for meaningful dialogue.

Lastly, the amount of time provided for public comments to this WIA Plan—3 business days—is utterly insufficient and unreasonable. Given the nature of the plan, it warranted an appropriate public commentary period. Several of our Board members have called us to complain that they would not be able to meet the timeframe established. As a result, we are certain that many public comments that the state of Maine would have otherwise received, will not be submitted. If MDOL/SWIB leadership truly encouraged and valued public comment, an extended time period for public comment would have been provided.

Sincerely,

Michael T. Bourret  
Executive Director

## Sardano, Timothy J

---

**From:** Talbot, Cindy <ctalbot@Husseyseating.com>  
**Sent:** Tuesday, March 12, 2013 2:20 PM  
**To:** DOL, SWIB  
**Subject:** Please resubmit Hussey Seating's prior comment on this matter

### Cindy Talbot, SPHR

Human Resources Director  
Hussey Seating  
38 Dyer Street Ext.  
North Berwick, ME 03906  
Direct Line: 207-676-0446  
Fax: 207-676-9506



Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333

January 28, 2013

I write to provide my comments on the proposed WIA Plan. This revised plan presents a dramatic shift from the single board approach – which was in theory intended to ensure consistency and reduce the costs/overhead associated with the current four LWIB structure – put forth in the September 2012 version of the plan that was not approved by USDOL, to a new EIGHT LWIB structure being proposed now – which is also supposedly intended to produce some measure of cost-savings and consistency.

Now, if the intention here is to realize cost savings and consistency across the state, how does the creation and designation of EIGHT LWIB's (versus four) that have both the responsibility and authority afforded them by the Workforce Investment Act itself accomplish either of those stated goals? I would presume that each LWIB area would require administrative services and corresponding expenses.

Clearly, federal law, 29 CFR §2841, provides that local board for a local area, with the agreement of the chief elected official for the local area, shall: 1) develop and enter into the memorandum of understanding described in subsection (c) of this section with one-stop partners; 2) designate or certify one-stop operators under subsection (d) of this section; and 3) conduct oversight with respect to the one-stop delivery system in the local area. Arguably the amount of administrative work would only increase in a system from four to eight areas. It is unclear as to how the EIGHT LWIB structure would be viable given the fact that administrative funds are based on 10% of the formula allocation per county and that no more resources are being provided to accomplish this eight area system.

Given the above, and that in my opinion there is no real necessity for the changes being proposed i.e., going from four to eight areas, I am hopeful the USDOL will not approve this WIA Plan.

On an additional professional note, I have had the opportunity to use the services of my local area LWIB on several occasions both when increasing employment for companies I was employed with as well as helping to train displaced workers. In all cases the services and help my employees received was superior. As an "old" yankee, I have to ask "If it isn't broke why fix it"?

Sincerely



Cynthia Talbot, SPHR  
Human Resources Director  
207-676-4918

## **Sardano, Timothy J**

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**From:** Dave Tomm <tommdl@msn.com>  
**Sent:** Tuesday, March 12, 2013 2:25 PM  
**To:** DOL, SWIB  
**Subject:** Comments on the latest SWIB Strategic Plan

### **Seasoned Workforce LLC**

PO Box 1072 - Rockland, ME 04841

<http://www.seasonedworkforce.com>

March 12, 2013

Re: Maine's 2012 - 2016 Workforce Investment Act Strategic Plan

Dear Committee,

Thank you again for the opportunity to comment on your latest SWIB Strategic Plan. It is shocking that after two years, the fight is still on all just to appease the ineffectual LWIBs and their stakeholders at the expense of helping Maine workers acquire the skills they need to find better paying jobs, or even to just find a job. We have the benefit of thousands of able Maine government employees with an infrastructure that could continue to be mobilized with new visions and ideas that would help Maine workers and businesses right now.

Please look into the great work already being done by our current CareerCenter people and the dozens of other programs that work here in Maine. Don't be afraid of looking at depth into our own Seasoned Worker Forums and the records we accumulated over 19 months as part of Maine's 2009 Aging Worker Initiative Grant. A report of our actual contributions is on our website <http://www.seasonedworkforce.com> and there is much more. Many programs like ours that worked well were scrapped by unilateral decisions by the LWIBs management in their desperate search for administrative funds after Governor LePage recognized that less than 15% of the federal money received by the LWIBs is actually used to help Maine workers or businesses.

Companies in Maine need reliable, trained people right now! May I continue to suggest the committee take a serious look at the largest growing segment of Maine's population and workforce – our seasoned people (folks age 50 and older and all those from the Baby Boomer Generation turning 50 every day). They have all the soft skills companies want, reliability, loyalty and are quickly adapting to new technologies – they have all the stuff that builds great teams. Continue the quest for programs to help equip our youth is critical but can we wait 20 years until they are available for employment? The seasoned worker is no longer a special interest group – they are a critical piece of Maine's economic future. They are the healthiest, best educated generation in human history and we need them now!

Unfortunately, parts of the new plan are even more complicated with even more people drawn into meetings and planning activities – simplify that so you have more flexibility. The concept of drawing in the expertise and suggestions of Maine Chambers of Commerce was an excellent one. But as now formulated you're going to lose business partners quickly. Most business owners or managers I know will not subject themselves to hours and hours and hours of discussion to formulate new plans when to date NOTHING has been done using what

we already know. Engage businesses as best you can as proposed but please implement some ideas that address their needs for workers now.

Thousands of Mainers need and want to work now! Companies need help, right now! We have the infrastructure and many quality Maine government servants in place to help solve workforce problems - we have the talent try some new ideas.

Thank you for your kind attention.

***Dave Tomm***

President - Seasoned Workforce LLC



March 12, 2013

Fred Webber, SWIB Chair  
SWIB  
SHS 120  
Augusta, ME 04330

Dear Mr. Webber,

I am writing to comment on the current reiteration (March 2013) changes to the Proposed State WIA. I write this letter in opposition to the plan being put forth.

My vantage point is that of a public official who has had over a decade of workforce development involvement in this state, having been one of the original County Commissioners that set up the current WIA system, in addition to having served as a State Representative. I am nothing less than appalled by the complete disenfranchisement that officials like me have undergone as a result of the current State administration.

For more than a year now the State has attempted to change the way WIA is delivered in Maine without consulting the Chief Local Elected Officials (CLEOS). This latest plan revision, which allegedly was drafted with Technical Assistance from Region 1 USDOL, has been posted for comment while I (President of Area 4, CLEO Board) and our other board leaders and staff (along with our colleagues from the other Local Areas of the state) are attending the National Association of Workforce Boards in Washington D.C. In addition, it is being posted with only 3 working days for public comment!

These are the latest egregious actions which serve as evidence that this administration continues to act in bad faith. This administration appears not to be serious about obtaining input from the County Commissioners of Maine. It is clear that the only reason they are now reaching out is to superficially comply with USDOL directive (the WIA regulations) requiring consultation with the CLEO. There is no commitment by the administration to involve the commissioners (nor partners, or stakeholders for that matter) in the WIA Plan development process.

I am hopeful that someone in the Maine Department of Labor or Le Page administration will someday come to the realization that if a two way street to dialogue is not provided and mutual respect is not shown or, that the administration continues to deny the County Commissioners' role vis-à-vis WIA program delivery in Maine, then no positive changes will be made and the people of this state will suffer.

Sincerely,



Charles Crosby III  
CCWI President & CLEO Chair

## Sardano, Timothy J

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**From:** Otis Smith <otsmithae@gmail.com>  
**Sent:** Tuesday, March 12, 2013 3:24 PM  
**To:** DOL, SWIB  
**Cc:** otsmith@rsu29.org  
**Subject:** LWIB comment

Dear Members of the SWIB:

Thank you for this opportunity to comment on the proposed state LWIB plan.

As the adult education director in Houlton and co-chair of the LWIB Youth Council, Based on my experience and exposure to LWIB information, I must admit that I am unable to foresee any benefit of this reorganization in Region One. To the best of my knowledge, the contracted providers work within the existing county boudaries, and, if those boundaries are changed to match Chamber regions, I can envision gaps in service through a, perhaps lengthy, transitional period.

Also, I would like to comment that I, as director of an educational institution, have no complaints about the administration of funds in our Region. I would be interested to know if the SWIB has received such complaints from either the service providers (e.g. educational providers) or students/recipients.

Finally, I have serious concerns about the ability of the Chambers of Commerce, particularly in non-urban areas such as Aroostook and Washington counties, to meet the expectations of the reorganization. I have served two terms as president of the Greater Houlton Chamber of Commerce and I can say with certainty that our local chamber is not prepared to assume additional responsibilities that may come with the reorganization. On the other hand, if the reorganization is not going to require more resources of the local Chambers, why bring them into the mix at all.

Thank you for your attention to these comments. I would be happy to further discuss these concerns with you as you move forward.

Sincerely,  
Otis Smith  
email: [otsmith@rsu29.org](mailto:otsmith@rsu29.org)  
[Tel:Cell# 694-1698](tel:694-1698)

**Sardano, Timothy J**

---

**From:** Bill Collins <bcollins@penobscot-county.net>  
**Sent:** Tuesday, March 12, 2013 3:39 PM  
**To:** Oates.Jane@dol.gov  
**Cc:** DOL, SWIB  
**Subject:** See Attached Public Comment Letters  
**Attachments:** CLEO Letter 24 JAN 2013.pdf; TCWIB PUBLIC COMMENT SWIB PLAN 3 pdf r.pdf

**Importance:** High

Ms. Oates & Maine SWIB:

Please accept the attached letters of Public Comment from our Local Cleo and our Local Workforce Investment Boards regarding Maine's 2012 – 2016 Workforce Investment Act Strategic Plan.

These letters will be US Mailed later today.

Respectfully submitted,

Bill Collins  
Penobscot County Administrator  
207-942-8535 Ext. 1



**TRI COUNTY  
WORKFORCE  
INVESTMENT BOARD**

*Linking Workforce and Economic Development in Hancock, Penobscot, and Piscataquis Counties*

March 12, 2013

Fred Webber, Chair  
State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

Dear Mr. Webber:

As the Chair of the Tri County Workforce Investment Board (TCWIB) I am writing on behalf of the board to oppose the revised WIA Strategic Plan posted online Thursday March 7, 2013. The TCWIB supports the County Commissioners opposition to the WIA Strategic Plan. On Thursday evening March 7, 2013 at 6:18pm I was informed that the SWIB had posted a third revised WIA Strategic Plan. Mr. Oswald stated in his message to the public that the comment period would last only until end of the business day Tuesday March 12, 2013. The time allowed to comment on this very important document is unreasonable and irresponsible. This is yet another example of the distance between the SWIB and many of the workforce stakeholders throughout the state. To date our local area has not felt there has been any investment on the SWIB'S part to collaborate in the development of a system with input from our partners.

As stated in my letter dated January 24, 2013, (posted public comment for the second revision) the TCWIB has been working closely with Eastern Maine Development Corporation to align workforce and economic development and ensure that small businesses are receiving services that will connect them to the workforce needed to launch or grow their businesses. In this vein the TCWIB has made several attempts to communicate with the Maine Department of Labor to share best practices and communicate in a manner that will support the region and hopefully the state at large. These attempts have been to no avail. We are strongly opposed to the plan.

Sincerely,



Dan Tremble, Chair- Tri County Workforce Investment Board  
Business Owner-  
Ground Round Grill & Bar, Pepino's Restaurant, and Fairmount Market

January 24, 2013

S.W.I.B.

SHS 120

Augusta, ME 04333

To Whom It May Concern:

We, the County Commissioners designated as the Chief Local Elected Officials (CLEOs) serving the State of Maine have not been consulted as required by Section 116 of the Workforce Investment Act of 1998 in relation to the proposed State WIA Plan. Furthermore, we remain opposed to a re-designation of the local areas and do not support the proposal to align Maine's workforce regions along the county boundary lines of the state's Chamber of Commerce regions at this time.

We encourage the United States Department of Labor to deny the proposed state plan and until such time as the CLEOs are consulted we will remain opposed.

We are willing and ready to work with the Administration and look forward to a constructive and collaborative dialogue in the future that best meets the needs of Maine's job seekers and businesses in Maine.

Sincerely,



Christopher Gardner, Co-CLEO  
Washington County (Local Area 1)



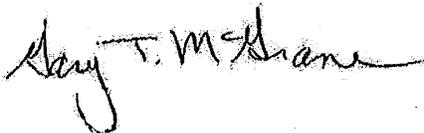
Charles Crosby, CLEO Chair  
Sagadahoc County (Local Area 4)



Thomas J. Davis Jr., CLEO Chair  
Penobscot County (Local Area 2)



Norman Fournier, Co-CLEO  
Aroostook County (Local Area 1)



Gary McGrane, CLEO Chair  
Franklin County (Local Area 3)



HOUSE OF REPRESENTATIVES  
2 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0002  
(207) 287-1440  
TTY: (207) 287-4469

**Alexander R. Willette**  
Assistant Republican Leader

Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333

March 12, 2013

Dear Members of the Maine State Workforce Investment Board,

As you again open the public comments for the Maine Workforce Investment Act Strategic Plan for 2012-2016, I would like to reiterate my support for Governor LePage's proposal.

Earlier this year, I stated that Governor LePage's proposal takes the state in the right direction, and would be the best plan to implement. The Governor's proposal addresses job-specific skill training, increased fiscal accountability, and increased access to job training – all of which are areas of concern that need to be addressed.

Thank you for your consideration and your continued work on this process. Please do not hesitate to be in touch should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alex R. Willette'.

Alexander Willette  
State Representative

**Sardano, Timothy J**

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**From:** Jeff Fantine <jeff.fantine@gmail.com>  
**Sent:** Tuesday, March 12, 2013 3:59 PM  
**To:** DOL, SWIB  
**Subject:** ME WIA Plan Public Comments  
**Attachments:** Fantine WIA Plan Comments.pdf

Going to send again as I did this morning and didn't get an email confirmation like I did the last time. Hope it goes through.

Jeff Fantine

January 28, 2013

Jeffrey A. Fantine  
1662 Baltimore Road, NW  
Lancaster, OH 43130

**RE: Public Comment on Maine Workforce Investment Act Strategic Plan for 2012-2016**

To whom it may concern:

During my tenure as the State Director of Adult Education in Maine from March, 2008 through April, 2011, I had the opportunity to work closely with all four Local Workforce Investment Boards (LWIB's) on initiatives such as *Maine's WorkReady Credential* and *Career Pathways for Education, Career and Life Success*. Both initiatives were designed to strengthen Maine's education and occupational training system for unemployed and underemployed adults, and to equip those adults with the knowledge and skills necessary to acquire high-demand jobs. The four existing LWIB's were valuable partners in this statewide effort and were responsive to both business and jobseeker needs; the proposed Workforce Investment Act (WIA) Strategic Plan appears to suggest this is not the case.

Maine's WorkReady Credential Initiative is a partnership between Maine Adult Education and the four LWIB's that was developed, prior to my involvement with Adult Education in Maine, in response to the need for workers to have appropriate "soft-skills," as such skills were continually being articulated to the LWIB's by businesses in their regions as lacking among jobseekers. Since its inception, this partnership has resulted in tremendous success, particularly by engaging hundreds of employer representatives. As I began to implement a new Career Pathways system for Maine Adult Education, I intentionally began aligning local adult education programs by their respective LWIB region and this proved effective as we moved forward with Adult Career Pathways.

Regarding the proposed WIA Strategic Plan: during my attempts to involve local Chambers around the state in this process, I found very few with adequate resources to address critical aspects of an effective workforce development system, resources that the current LWIB structure already has in place. It seems to me that moving from four to eight regions would require significant infrastructure costs that would be necessary for these regional networks to work effectively and would further dilute the limited financial resources that are available to meet Maine's workforce development needs. I would propose that a more effective WIA Strategic Plan would be to strengthen the work of the existing four LWIB's through a strategy of having them involve local Chambers. This would address the issues of more effective employer engagement and meeting local area needs throughout the state. In addition, this would be a more collaborative approach and would help address the "siloed" issue referenced in the plan (which, in my opinion, is the true problem with the existing system that this proposed new plan will not address) without adding additional infrastructure costs.

The proposed WIA Strategic Plan includes much reference to "return on investment" (ROI) that will be realized by shifting from the existing four LWIB's to a newly devised system of eight. However, the Plan does not clearly articulate how this will, in fact, be achieved. From my experience, the alignment of adult education and LWIB's and the strong partnerships that were established on the aforementioned initiatives allowed us to leverage tremendous resources and see a return on investment that we would not have otherwise. For example, if we wanted to better address the local needs for adult education services, it would not make sense to further burden the limited resources that currently exist with

additional infrastructure costs by adding more programs, but rather develop strategies to strengthen existing programs so they have more capacity to meet local area needs.

While I agree with some of the issues that are presented in the proposed WIA Strategic Plan as “Challenges of the Current System,” I do not believe the proposed “Elements of the State Plan” will address them. I urge you to carefully consider what value and/or ROI, if any, would actually be realized by increasing the number of local areas or if, ultimately, this would result in a more administratively burdensome, costly, and fragmented system.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey A. Fantine". The signature is written in a cursive style with a large, stylized "J" and "F".

Jeffrey A. Fantine  
Maine's Former State Director of Adult Education

## Sardano, Timothy J

---

**From:** Kimberly Lindlof <Kimberly@MidMaineChamber.com>  
**Sent:** Tuesday, March 12, 2013 4:01 PM  
**To:** Oswald, Garret J.  
**Subject:** RE: REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSES TODAY AT 5:00PM

Please resubmit my old letter. Thanks. ☺

Kim  
Kimberly N. Lindlof, IOM  
President & CEO  
Mid-Maine Chamber of Commerce  
50 Elm St, Waterville, ME 04901  
207.873.3315; cell: 207.649.6676  
[www.midmainechamber.com](http://www.midmainechamber.com)

### Upcoming Events:

**Business After Hours: March 20<sup>th</sup> at The Brown House Company; 5:30 – 7 PM**

**Business Breakfast Series: March 14: Cover Your Assets. Waterville Chief of Police, Joe Massey, will share his expertise on how to protect your business from the most common internal & external threats. Thomas College, 180 W.River Rd., Wtvl 7:15 – 9AM**

**Did you know: A single class of high school dropouts will earn \$154 billion dollars less than their high school graduate counterparts, which leads to a lower contribution to the tax base, less spending power, and lower productivity. High-quality early care and education is critical to teaching students skills that contribute to greater high school graduation rates.**  
*Alliance for Excellent Education, 2011*

**DID YOU KNOW: By 2018, 63% of all jobs in the United States and 59% of all jobs in Maine will require post-secondary education. (Georgetown Center on Education & The Workforce, 2010) Proven investments in children, such as quality early learning and innovative high school programs, which combine career relevance with rigorous academics, are critical in ensuring that our kids are prepared for the future workforce.**

**DID YOU KNOW:** In a survey of manufacturers nationwide, seven out of ten companies reported skilled production worker shortages, i.e. machinists, operators, craft workers, distributors and technicians (Deloitte & The Manufacturing Institute, 2011). Innovative high school education models help high school students understand the relevancy of their academic coursework and get real world experience to increase their skill levels.

**Did You Know:** the U.S. Department of Education estimates that 36 percent of students entering higher education require at least one remedial education class? An improvement in our education system, particularly in quality early learning and innovative high school programs that bring career relevance into the classroom, will help ensure students are better prepared for college and career.

### Economic Quote:

*"Economically speaking, early childhood programs are a good investment with inflation-adjusted annual rates of return on the funds dedicated to these programs, estimated to reach 10 percent or higher. Very few alternative investments can promise that kind of return. Notably, a portion of these economic returns accrues to the children themselves and their families, but studies show that the rest of society enjoys the majority of the benefits, reflecting*

*the many contributions that skills and productive workers make to the economy."* by Ben Bernanke, Chairman of the Federal Reserve Board



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**From:** Oswald, Garret J. [<mailto:Garret.J.Oswald@maine.gov>]  
**Sent:** Tuesday, March 12, 2013 4:00 PM  
**To:** Kimberly Lindlof  
**Subject:** RE: REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSSES TODAY AT 5:00PM

No. Just tell me you want to resubmit your previous letter and you are all set.

Thanks Kim.

Garret Oswald  
Director, State Workforce Investment Board  
State House Station 120  
Augusta Maine, 04332

Office 207-621-5087  
Cell 207-592-1455

---

**From:** Kimberly Lindlof [<mailto:Kimberly@MidMaineChamber.com>]  
**Sent:** Tuesday, March 12, 2013 3:59 PM  
**To:** Oswald, Garret J.  
**Subject:** RE: REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSSES TODAY AT 5:00PM

I don't need to this yet again do I?

Kim  
Kimberly N. Lindlof, IOM  
President & CEO  
Mid-Maine Chamber of Commerce  
50 Elm St, Waterville, ME 04901  
207.873.3315; cell: 207.649.6676  
[www.midmainechamber.com](http://www.midmainechamber.com)

**Upcoming Events:**  
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**Business Breakfast Series: March 14: Cover Your Assets. Waterville Chief of Police, Joe Massey, will share his expertise on how to protect your business from the most common internal & external threats. Thomas College, 180 W.River Rd., Wtvl 7:15 – 9AM**

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**Did You Know:** the U.S. Department of Education estimates that 36 percent of students entering higher education require at least one remedial education class? An improvement in our education system, particularly in quality early learning and innovative high school programs that bring career relevance into the classroom, will help ensure students are better prepared for college and career.

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*"Economically speaking, early childhood programs are a good investment with inflation-adjusted annual rates of return on the funds dedicated to these programs, estimated to reach 10 percent or higher. Very few alternative investments can promise that kind of return. Notably, a portion of these economic returns accrues to the children themselves and their families, but studies show that the rest of society enjoys the majority of the benefits, reflecting the many contributions that skills and productive workers make to the economy."* by Ben Bernanke, Chairman of the Federal Reserve Board



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**From:** Oswald, Garret J. [<mailto:Garret.J.Oswald@maine.gov>]  
**Sent:** Tuesday, March 12, 2013 3:58 PM  
**To:** Oswald, Garret J.  
**Subject:** REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSING TODAY AT 5:00PM

**\*\*If you have not already resubmitted your comments you have one more hour (until 5:00 PM tonight) to do so.\*\***

Based on feedback from the United States Department of Labor Employment & Training Administration, Maine's 2012 – 2016 Workforce Investment Act Strategic Plan has been revised (see list of revisions below). The State Workforce Investment Board is accepting public comments regarding the revised Plan, and we encourage you to take the opportunity to express your opinion.

The revised plan can be viewed at [www.maine.gov/swib/wia\\_plan.html](http://www.maine.gov/swib/wia_plan.html)

**Public comments will be accepted via e-mail at [swib.dol@maine.gov](mailto:swib.dol@maine.gov) or faxed to (207) 287-5292, from 5:00 PM on 3/7/13 until 5:00 PM on 3/12/13.**

**If you have previously submitted a comment and want to have it counted in this round of public comments, you can do so by replying to [swib.dol@maine.gov](mailto:swib.dol@maine.gov) and expressing your desire to resubmit your previous comment.**

The following changes have been made to the Strategic and Operational sections of the plan;

- Page 39 - 40; Highlighted sections
- Page 59; Organizational Chart
- Pages 61 - 62; State Workforce Investment Board Membership List
- Pages 62 – 66; Highlighted sections
- Page 82; Highlighted section
- Pages 107 – 110; Highlighted sections
- Pages 118 - 121; Allocation Chart, highlighted sections, Workforce System chart

The following changes have been made to the Attachments section of the Plan;

- Attachments G and M from the previous draft of the Plan have been omitted
- Attachments D, E, H, L, and Q from the previous draft of the Plan have been revised
- Attachments T, U, and V are new attachments that do not appear in the previous draft of the Plan

The following changes have been made to the Assurances section of the Plan;

- Assurance 29 has been revised to explain that Maine does not run stand-alone summer youth employment programs and that Local Workforce Investment Boards that do so must have their own criteria for awarding grants and contracts for this element of their local youth programs
- Assurance 36 has been revised to explain that Maine has not chosen to establish definitions and eligibility documentation requirements for “requires additional assistance to complete an education program, or to secure and hold employment”

Thank you.

Garret Oswald  
Director, State Workforce Investment Board  
State House Station 120  
Augusta Maine, 04332

Office 207-621-5087  
Cell 207-592-1455

## Sardano, Timothy J

---

**From:** Kimberly Lindlof <Kimberly@MidMaineChamber.com>  
**Sent:** Thursday, January 24, 2013 9:33 AM  
**To:** DOL, SWIB  
**Subject:** Public Comment

Mid-Maine Chamber of Commerce stands ready to assist the State in its new restructuring of the workforce investment delivery system. We feel that the new structure will provide more employer feedback to the State Workforce Investment Board and allow for more training dollars to flow to those in need thereby assisting our membership in finding well trained and able employees to fill vacant positions. Our number one goal is to help our businesses grow and succeed, and having a willing and able workforce is key to that success. Although there are details to be worked out, we feel that the broad outline as thus defined will provide greater equality in programs and services throughout the State and increased connectivity to the business community that will benefit from speaking more directly to those providing the workforce development resources. Mid-Maine Chamber is in hopes that this new approach/delivery system will be driven by the needs of the business community as opposed to the strengths of the particular LWIBs and their staffs that existed previously.

*--Mid-Maine Chamber of Commerce represents 14 communities and over 600 members in the greater Waterville region.*

Kim  
Kimberly N. Lindlof, IOM  
President & CEO  
Mid-Maine Chamber of Commerce  
50 Elm St, Waterville, ME 04901  
207.873.3315; cell: 207.649.6676  
[www.midmainechamber.com](http://www.midmainechamber.com)

### Upcoming Events:

**Business After Hours: Feb. 13<sup>th</sup> at Waterville Opera House, co-sponsored by Golden Pond Wealth Management; 5:30 – 7 PM**

**Business Breakfast Series: Feb. 14: Maine Bureau of Insurance – How We Can Help You. Michael Mayette, property/casualty division supervisor, will provide an overview of Bureau's regulatory role and address insurance issues and questions that have an im-pact on small businesses. Thomas College, 180 West River Rd., Waterville 7:15 – 9AM**

**Did you know... In Maine 61% of eighth graders are below grade level in math. This leads to a high percentage of high school dropouts, which costs the U.S. dearly in lost productivity. The solution? Start early.**

**DID YOU KNOW: By 2018, 63% of all jobs in the United States and 59% of all jobs in Maine will require post-secondary education. (Georgetown Center on Education & The Workforce, 2010) Proven investments in children, such as quality early learning and innovative high school programs, which combine career relevance with rigorous academics, are critical in ensuring that our kids are prepared for the future workforce.**

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## Sardano, Timothy J

---

**From:** Robin Zinchuk <robin@bethelmaine.com>  
**Sent:** Tuesday, March 12, 2013 4:05 PM  
**To:** DOL, SWIB  
**Subject:** Robin Zinchuk's comments

Hello,

I had submitted comments during the last comment period that I would like to have resubmitted. Thank you.

Robin Zinchuk

Executive Director

Bethel Area Chamber of Commerce

207-824-2282

Sent from my iPhone

## Sardano, Timothy J

---

**From:** Robin Zinchuk <robin@bethelmaine.com>  
**Sent:** Monday, January 28, 2013 3:01 PM  
**To:** DOL, SWIB  
**Subject:** Comments on the SWIB Strategic Plan  
**Attachments:** image003.jpg; image002.jpg

Good afternoon,

I would like to go on record as supporting the SWIB plan to make needed changes to the Maine Workforce Development System. The current system, with four LWIBs spread across the State, has been very ineffective in delivering service to the businesses and employers here in the Bethel area. I have been a Chamber Director in Bethel for 26 years, and had been in the work for more than 20 before ever knowing what LWIB meant. I have had no outreach from the Central Maine Workforce Investment Board until this past year (when I contacted them to participate in a Job Fair we were planning,) and I also have had little or no contact with the Career Center directors in either South Paris or Rumford.

If our goal – both on the Federal and State Level – is to train our workforce for the jobs to help move our economy forward, this system needs refinement. Here in the Bethel region, our economy is largely dependent on the Visitor Industry. Little or no funds have been available to help train the thousands of individuals working in the hospitality and general service industries. We have been dependent on private businesses and outside foundations to provide funding for the Maine Woods Tourism Training Initiative – and I believe MDOL should have a role. We need more destination training throughout our State – which would help the existing workforce to provide a higher level of service to the millions of visitors who travel to Maine each year and spend billions of dollars.

I know we need to provide training funds for other sectors such as health care, the metal trades, information technology, to name a few– but many of these kinds of jobs are not even available in the more rural parts of Maine. I have always been a strong believer that Maine’s educational system (K-12) needs to retool itself and help prepare Maine kids to be more entrepreneurial. The reality is that we have lost many of the previous manufacturing jobs in rural Maine and, if we want our youth to stay here, they need to be equipped to start their own businesses of various types. What role could the SWIB play in this? We need to ask ourselves these questions and not accept the status quo.

Yes – we NEED change – and I will do whatever I can as a Chamber Director to help facilitate the SWIB vision.  
Many thanks,



Robin Zinchuk  
Executive Director  
Bethel Area Chamber of Commerce  
P.O. Box 1247, Bethel, ME 04217  
207.824.2282, 800.442.5826  
[robin@bethelmaine.com](mailto:robin@bethelmaine.com)  
[www.bethelmaine.com](http://www.bethelmaine.com)  
[www.facebook.com/bethelarea](http://www.facebook.com/bethelarea)

Maine's  
most beautiful  
mountain village

*Bethel*

Bethel Area Chamber of Commerce

## Sardano, Timothy J

---

**From:** Sanford Chamber <ricks@metrocast.net>  
**Sent:** Tuesday, March 12, 2013 4:07 PM  
**To:** DOL, SWIB  
**Subject:** WIA Strategic Plan

As President of the Sanford Springvale Chamber of Commerce I support the revised plan in whole and look forward to being a partner in this innovative approach to economic development for the State of Maine.

*Richard L. Stanley*  
*Sanford Springvale Chamber of Commerce*



## Sardano, Timothy J

---

**From:** Sanford Chamber <ricks@metrocast.net>  
**Sent:** Tuesday, January 29, 2013 3:43 PM  
**To:** DOL, SWIB  
**Subject:** workforce plan

Using the Chamber network to promote workforce development is a strategy that is a long time coming. Who better to know the needs of the business community than local chamber directors. We are already the eyes and ears of our membership.

*Richard L. Stanley  
Sanford Springvale Chamber of Commerce*



## Sardano, Timothy J

---

**From:** Ted St. Amand <ted@atlanticpestsolutions.net>  
**Sent:** Tuesday, March 12, 2013 4:16 PM  
**To:** DOL, SWIB  
**Subject:** Proposed State WIA Plan Comments  
**Attachments:** St. Amand WIA State Plan Comment.pdf

Dear Sir or Madam,

I would like to resubmit the attached comments relative to the proposed State WIA Plan.

Thank you for your consideration.

Ted St. Amand  
President  
Atlantic Pest Solutions  
P.O. Box F  
Kennebunkport, Maine 04046  
Office: (800) 439-7716  
Cell: (207) 251-3144  
[www.atlanticpestsolutions.net](http://www.atlanticpestsolutions.net)

---

**From:** Ted St. Amand <ted@atlanticpestsolutions.net>  
**Sent:** Tuesday, January 29, 2013 1:12 PM  
**To:** DOL, SWIB  
**Subject:** WIA Plan Comments

Dear Sir or Madam,

I am once again writing to comment on Maine's State Workforce Investment Act (WIA) Plan being submitted to United States Department of Labor. In the way of background, I am a small business owner in Maine and a former Local Workforce Investment Board Chair, a Coastal Counties Workforce Board Director for six years and a member of the Southern Mid-Coast Maine Chamber. In the past couple of years, my business has accessed important job training resources through the current workforce system and these training services and resources have been very important to my business.

Let me first say that, once again, the development of the State WIA Plan (both the September 2012 version and this revised version) has occurred in the absence of consultation with both the Local Workforce Investment Boards (LWIBs) and the Chief Local Elected Officials (CLEOs). The LWIB in my area was not informed of the new strategies (i.e. the expansion from four to eight local areas) outlined in the revised WIA Plan until the plan was finalized – when I inquired about the vision and strategy of the plan prior to that, CCWI staff were not able to provide this information, as they had not been made privy to it. Affording these entities the opportunity to participate or comment only after the plan and its associated policies have been developed and readied for public posting does little more than play lip service to the notion.

Notwithstanding the clear issues with regard to the way in which this plan and its associated policies were devised, there are other questions and concerns that the plan itself elicits. It proposes to better serve employers through the creation of industry partnerships and once again I must say that the concept of industry partnerships is not new; the existing LWIBs regularly seek and obtain federal resources for a variety of sector initiatives including IT, Health Care, Composites, Advanced Manufacturing and STEM related occupations. These initiatives are overseen by these majority private sector boards.

While industry employers in Maine are able to obtain new hire training through the federal grant opportunities mentioned above, but their incumbent worker skill needs remain unaddressed. This is due to certain federal restrictions within WIA which are beyond the control of state or local policymakers. For instance, the (WIA) program cannot serve incumbent workers unless the state of Maine has an active USDOL waiver permitting such and the employer being served must be at risk of closure. This is a huge hurdle to overcome and the waiver therefore does Maine little good as the majority of employers do not meet this standard. Employers are constantly raising concerns about their lack of ability to address incumbent worker training, but their firm isn't necessarily at risk of closure.

In 1996, the State of Maine created the Governor's Training Initiative (GTI) to supplement the WIA workforce system so that employers could have this important training need (incumbent training) met. Maine served thousands of incumbent workers annually up until your administration took office. Unfortunately, this administration eliminated GTI during its first legislative session.

Regardless of whether or not this State Plan is approved as is, the resources to effectively serve employer needs, specifically their incumbent workers training needs, will still not exist in Maine. If the State of Maine provided needed resources to supplement WIA, this incumbent worker need could once again be met. It seems doubtful that increasing LWIBs from four to eight will have any chance of producing these results.

Ted St. Amand  
Atlantic Pest Solutions  
P.O. Box F  
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Office: (800) 439-7716  
Cell: (207) 251-3144  
[www.atlanticpestsolutions.net](http://www.atlanticpestsolutions.net)

## Sardano, Timothy J

---

**From:** Mike Barnes Brook <mike@barnesbrookgolfandski.com>  
**Sent:** Tuesday, March 12, 2013 4:18 PM  
**To:** DOL, SWIB  
**Cc:** Lincoln Chamber  
**Subject:** WIA

To: Maine Dept of Labor

### **Wikipedia definition;**

**Skill** is a measure of the amount of worker's expertise, specialization, wages, and supervisory capacity. Skilled workers are generally more trained, higher paid, and have more responsibilities than unskilled workers. Skilled workers have long had historical import as masons, carpenters, welders, blacksmiths, bakers, brewers, coopers, printers and other occupations that are economically productive. Skilled workers were often politically active through their craft guilds.

Education is an important factor in increasing skill level. The increase in number of people attending high schools and colleges contribute to the increase in the supply of skilled labor. Mass education, however, is not the only factor. Immigration is also a big contributor. Immigrants created a bimodal skill distribution, where most immigrants were either low skill or high skill workers. There were few who were in between. Historical Reference - In the United States such factors have caused an overall increase in the supply of skilled labor during the 20th century. The shift from unskilled to skilled labor can be attributed to increases in human capital, or in other words increasing the efficiency of humans through investment in knowledge. The American boom in public education, specifically high schools, congruently increased the level of human capital and total factor productivity.

One of the factors that increases the relative demand for skilled labor is attributed to the introduction of computers. In order to operate computers, workers must build up their human capital in order to learn how such a piece of machinery works. Thus, there is an increase in the demand for skilled labor. In addition to the technological change of computers, the introduction of electricity also replaces man power (unskilled labor) which, in turn, also shifts out the demand curve.

Technology, however, is not the only factor. Trade and the effects of globalization also play a role in affecting the relative demand of skilled labor. One case includes a developed country purchasing imports from a developing country, which in turn replaces products made with domestic low-skilled labor. This, in turn, decreased the demand for low-skilled workers. Both of these factors, thus, increase the wages of highly skilled workers

We are a year round facility here in the greater Lincoln Lakes Region looking to continue to do business here. We are always looking for skilled labor. We always seem to be in the need for a welder, carpenter, computer specialist or other skilled labor in order to help us to continue to move forward as a company.

We as a company that belongs to the Greater Lincoln Lakes Region Chamber of Commerce are always talking to other businesses and feel like we are starting to feel a big hole coming up in the skilled labor in this area, whether it is in the paper or fabrication industry and other related technical skilled fields.

Region III Technical School here in the greater Lincoln area as well as local businesses are trying to help in all these areas but feel like they could use help. The Greater Lincoln Lakes Chamber of Commerce really wants to help this great area of the state.

The new workforce training system that is being proposed by the State of Maine will allow for greater input and local representation by increasing from four local workforce areas to eight, thereby providing a keener understanding of regional economic distinctions through expanded local input.

These eight new regions will be aligned with the existing Chamber of Commerce regions and are the same regions used by the Maine Office of Tourism. These regions better represent economic, labor market and geographic characteristics of our state and will allow us to better target training to our key regional needs. Also, Chambers of Commerce in Maine represent nearly 40% of Maine businesses so, by utilizing them as convening intermediaries, the chambers will instantly help double the number of businesses currently being engaged in the existing system.

This is a win-win scenario for the chambers and the State of Maine as more Maine businesses and residents will gain access to workforce training funds, and chambers will undoubtedly grow as prospective members recognize the value of being connected to the regional and statewide workforce delivery system.

Thank you for your time

Michael Clendenning

## Sardano, Timothy J

---

**From:** Lisa G. Martin <lisa@mainemfg.com>  
**Sent:** Tuesday, March 12, 2013 4:31 PM  
**To:** DOL, SWIB  
**Subject:** Public Comment

I am in favor of the SWIB State Plan and support the changes made.

Lisa G. Martin  
Executive Director  
The Manufacturers Association of Maine  
386 Bridgton Road  
Westbrook, ME 04092  
P:(207)854-2153  
F: (207)854-3865  
[lisa@mainemfg.com](mailto:lisa@mainemfg.com)  
[www.mainemfg.com](http://www.mainemfg.com)

Home and Administrator for the Maine Aerospace Alliance (MEAA), Maine Metal Products Education Fund, NIMS Management Center, Robotics Institute of Maine, Joint Manufacturing & Quality Council (JMQC), American Society of Quality (ASQ), Association for Operations Management (APICS), and Society of Manufacturing Engineers (SME)  
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## Sardano, Timothy J

---

**From:** Tim Ford <[tford@lrginc.com](mailto:tford@lrginc.com)>  
**Sent:** Tuesday, March 12, 2013 4:33 PM  
**To:** DOL, SWIB  
**Subject:** WIA Strategic Plan Public Comment Period

Please resubmit my previously submitted comments.  
Thank you-  
Tim Ford



Tim Ford | President/CEO  
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202.289.8322 | 202/230-7923 (M)  
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LRG is now a HUBZone-certified small business

January 29, 2013

Dear Commissioner Paquette and Chairman Webber:

I am writing you today as the CEO of the Leonard Resource Group (LRG), a private company that has supported workforce development on the local, state and federal level for nearly two decades. From the inception of the Workforce Investment Act, LRG has actively tracked policy developments around the country. I recently had the opportunity to learn more about the positive policy discussion taking place in Maine outlined in the new "Workforce Investment Act Strategic Plan 2012-2016."

As a company, we are not directly involved in Maine, but based on our longtime experience working with WIA programs, we wanted to share the following thoughts:

First, we were impressed with the focus the plan has on business, not only as the partner, but also as the customer. This is often a goal of states, but your plan to develop linkages with eight local chambers is unique and will ensure this goal is advanced.

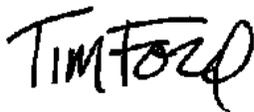
Second, workforce development can no longer function in a silo. It must be part of a broader economic development strategy. Your plan clearly understands the importance of concrete linkages.

Third, in a time of limited resources, developing a strategy that maximizes workforce investment areas of skill shortages and fast-growing occupations is critical and a clear priority in your plan.

Finally, given the resource constraints that the workforce development system will face in the near and long term, I would encourage you to consider alternative strategies for how key workforce services are delivered, such as a One-Stop system that is managed at the state level versus the regional approach currently used.

I appreciate the opportunity to provide input on the plans, and we are encouraged to see the forward-thinking approach the State of Maine is applying to this important policy area. Best of luck with the next steps in this plan, and please contact me if I can be of assistance.

Sincerely,



Tim Ford  
President/CEO, LRG

About LRG: A private company with a public mission, LRG advances organizations and issues that help individuals, communities and our society. Combining skills in coalition-building, organizational development, government relations, grassroots advocacy, event management, strategic communications and technical assistance, LRG provides comprehensive solutions to complex issues for government, nonprofit and corporate clients.

## Sardano, Timothy J

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**From:** Craig Pendleton <craig@biddefordsacochamber.org>  
**Sent:** Tuesday, March 12, 2013 4:38 PM  
**To:** DOL, SWIB  
**Subject:** Governor's Plan

To Whom it may concern;

I ask that you re-enter into the record, the letter of support that the Biddeford+Saco Chamber of Commerce & Industry previously submitted.

Please be advised that the Biddeford + Saco Chamber wholeheartedly continues to support the Governor's plan to more effectively distribute job training funds and to work more closely with local Chambers of Commerce.

Respectfully,

Craig A. Pendleton

Craig A. Pendleton, Executive Director  
Biddeford Saco Chamber of Commerce & Industry  
138 Main Street, Suite 101  
Saco, ME 04072  
(o) 207-282-1567  
(f) 207-282-3149  
(m) 207-590-9614  
(e) [craig@biddefordsacochamber.org](mailto:craig@biddefordsacochamber.org)  
(w) [www.BiddefordSacoChamber.org](http://www.BiddefordSacoChamber.org)

*The Biddeford-Saco Chamber of Commerce & Industry, Inc. is organized to advance and promote commercial and industrial prosperity, as well as the civic, cultural and educational interests of the communities it serves.*



138 Main Street, Suite 101 \* Saco, Maine 04072 \* Tel: (207) 282-1567

January 26, 2013

State Workforce Investment Board  
State House Station 120  
Augusta, ME 04333

To whom it may concern:

On behalf of the Board of Directors, our membership and in my capacity as Executive Director, please be in receipt of this letter of support of the revised Workforce Investment Act State Strategic Plan.

Several of my colleagues and I were part of a group of Chamber of Commerce leadership that was invited to meet with Governor LePage to hear his concerns that an unacceptable percentage of the federal job training funds received by the State of Maine are actually used for training. The Governor, Department of Labor staff and representatives of the State Workforce Investment Board asked if the Chamber of Commerce Directors would be willing to take on an important role and work with them by providing much needed outreach to businesses to disseminate specific information regarding workforce development. Much of what was being asked of us falls within our day to day duties such as collaborating on events like job fairs, business round tables, and performing surveys. My colleagues and I responded favorably and have since worked to finalize details which are now being presented in the strategic plan and its subsequent revision.

In the Biddeford-Saco region, where we have a solid manufacturing sector, the consistent message has been that these companies have positions to fill, but cannot find applicants with the required skills. This is quite disturbing given the trying economic times this country has experienced over the past few years. It is time to fix this problem and get Maine people working and companies profitable. One suggestion we have received from local manufacturers is an interest in a well defined on the job training program. Companies are willing to invest in workers, unfortunately, the costs of training workers from scratch not only increases costs but impacts current production by requiring more time from the trainers. If the Biddeford-Saco Chamber can play a small role in growing a talented and skilled workforce, we will have served our membership in a very supportive way.

**The Biddeford-Saco Chamber of Commerce and Industry, Inc. is organized to advance and promote commercial and industrial growth, as well as the civic, cultural and educational interests of the communities it serves.**

As I have spoken to my Board about this plan, another troubling issue that has been raised is that none of us had so much as heard of the Local Workforce Investment Boards. This to me is quite concerning given the amount of money and the responsibility vested upon this group to ensure that funds are used efficiently and effectively. Working more closely with Chambers of Commerce could bring greater opportunities for collaboration and significantly add efficiency to the usage of training funds.

In Biddeford-Saco, we believe that smaller, regional meetings with stakeholders such as Service Providers, Economic Development Groups, Educational Institutions, Municipal Officials and Local Businesses would prove to be more productive in identifying the workforce development needs of each region as well as provide the means for everyone to be informed and “on the same page” for future collaboration. Our Chamber is willing to work closely with State government in order to get effective training funds on the ground and to help make Maine’s workforce skilled and able to meet the demands of today’s global economy. We extend an offer of the usage of our facility and the skills our region can bring to the table in order to build a workforce for the future.

I appreciate the opportunity to comment on this important issue. Please feel free to contact me directly if you might have questions or need clarity on my comments.

Respectfully,

*Craig A. Pendleton*

Craig A. Pendleton  
Executive Director



40 Harlow Street Bangor, Maine 04401  
207.942.6389 www.mobilizeeasternmaine.com

**Mobilize Eastern Maine  
Leadership Team**

Michael Aube-EMDC  
Stephen Bolduc-City of Bangor  
Jen Brooks-EMDC  
Steve Condon-Town of Holden  
James Gerety-Bangor Mall  
Andrew Hamilton-Eaton Peabody  
Sue Hammond-Four Directions Maine  
Ned Jennings-Granville Stone  
Gail Kelly-Senator Olympia Snowe  
Renee Kelly-University of Maine  
D'Arcy Main-Boyington-City of Brewer  
Tom McGary-Balance Hair and Body  
John Moore-Bangor Savings Bank  
Julia Munsey-Oxford Networks  
John Porter-Bangor Region Chamber  
of Commerce  
John Simpson-Private Consultant  
Elizabeth Sutherland-Sutherland  
Weston  
Miles Theeman-Affiliated Healthcare  
Systems  
Kerrie Tripp-Greater Bangor  
Convention and Visitors Bureau  
Jake Ward-University of Maine  
Jerry Whalen-Eastern Maine  
Healthcare Systems  
Mark Woodward-Private Consultant  
Shawn Yardley-City of Bangor

Fred Webber  
State Workforce Investment Board  
120 Statehouse Station  
Augusta, ME 04333

March 11, 2013

Dear Fred:

On behalf of Mobilize Eastern Maine (MEM), I am writing to express our opposition to the State Workforce Investment Board's proposed plan, as well as our support of the Chief Local Elected Officials' (CLEO) position and role in our region.

As you may recall, MEM is a private/public partnership of regional business and community leaders and local economic and civic organizations working in Eastern Maine to pro-actively connect workforce and our businesses. We strongly support local control of decisions affecting economic and workforce development and believe that control should remain with the Chief Local Elected Officials (CLEOs), something the State Workforce Investment Board plan does not include.

The current structure, which includes the TriCounty Local Workforce Investment Board, works well with the business community in our region. We continue to believe the State Workforce Investment Board's proposed five-year plan would undermine successful workforce training efforts in our region.

Working in partnership with the CLEOs, local chambers, the WIB and the regional educational providers, we are committed to developing pathways for jobs and careers that have been identified through our goals and sectoral strategies. We feel the current proposed SWIB plan does not incorporate or value the work we have done to date. Nor has there been opportunity for us to engage in the development and design process.

In addition, we express our support for the letter from the Chief Local Elected Officials.

Thank you for this opportunity to comment and register our opposition to the proposed plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Sutherland', written in a cursive style.

Elizabeth Sutherland, APR  
MEM Co-Chair

## Sardano, Timothy J

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**From:** Randy Ford <rford@cwsconnect.org>  
**Sent:** Tuesday, March 12, 2013 4:48 PM  
**To:** Oswald, Garret J.  
**Subject:** RE: REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSSES TODAY AT 5:00PM  
**Attachments:** CWS Letter to Maine Workforce 012913.pdf

Garret: Please accept the Coalition for Workforce Solutions' resubmitted comments as attached.

Thank you.

### Randy Ford

Coalition for Workforce Solutions  
[rford@cwsconnect.org](mailto:rford@cwsconnect.org)  
202.289.8322 x424



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**From:** Oswald, Garret J. [<mailto:Garret.J.Oswald@maine.gov>]  
**Sent:** Tuesday, March 12, 2013 3:58 PM  
**To:** Oswald, Garret J.  
**Subject:** REMINDER - State Revises WIA Strategic Plan Public Comment Period - CLOSSES TODAY AT 5:00PM

**\*\*If you have not already resubmitted your comments you have one more hour (until 5:00 PM tonight) to do so.\*\***

Based on feedback from the United States Department of Labor Employment & Training Administration, Maine's 2012 – 2016 Workforce Investment Act Strategic Plan has been revised (see list of revisions below). The State Workforce Investment Board is accepting public comments regarding the revised Plan, and we encourage you to take the opportunity to express your opinion.

The revised plan can be viewed at [www.maine.gov/swib/wia\\_plan.html](http://www.maine.gov/swib/wia_plan.html)

Public comments will be accepted via e-mail at [swib.dol@maine.gov](mailto:swib.dol@maine.gov) or faxed to (207) 287-5292, from 5:00 PM on 3/7/13 until 5:00 PM on 3/12/13.

If you have previously submitted a comment and want to have it counted in this round of public comments, you can do so by replying to [swib.dol@maine.gov](mailto:swib.dol@maine.gov) and expressing your desire to resubmit your previous comment.

The following changes have been made to the Strategic and Operational sections of the plan;

- Page 39 - 40; Highlighted sections

- Page 59; Organizational Chart
- Pages 61 - 62; State Workforce Investment Board Membership List
- Pages 62 – 66; Highlighted sections
- Page 82; Highlighted section
- Pages 107 – 110; Highlighted sections
- Pages 118 - 121; Allocation Chart, highlighted sections, Workforce System chart

The following changes have been made to the Attachments section of the Plan;

- Attachments G and M from the previous draft of the Plan have been omitted
- Attachments D, E, H, L, and Q from the previous draft of the Plan have been revised
- Attachments T, U, and V are new attachments that do not appear in the previous draft of the Plan

The following changes have been made to the Assurances section of the Plan;

- Assurance 29 has been revised to explain that Maine does not run stand-alone summer youth employment programs and that Local Workforce Investment Boards that do so must have their own criteria for awarding grants and contracts for this element of their local youth programs
- Assurance 36 has been revised to explain that Maine has not chosen to establish definitions and eligibility documentation requirements for “requires additional assistance to complete an education program, or to secure and hold employment”

Thank you.

Garret Oswald  
Director, State Workforce Investment Board  
State House Station 120  
Augusta Maine, 04332

Office 207-621-5087  
Cell 207-592-1455



## COALITION FOR WORKFORCE SOLUTIONS

January 29, 2013

Dear Commissioner Paquette and Chairman Webber:

On behalf of the Coalition for Workforce Solutions, a national coalition uniting organizations that provide support for the nation's workforce development system, I appreciate this opportunity to share my thoughts on the new Maine's "Workforce Investment Act Strategic Plan 2012-2016. While we are not directly connected to Maine, we track workforce policy at the national and state levels and were very pleased to see the direction Maine is taking to be innovative in addressing both current and future demands of the state's workforces.

In reviewing the plan, I wanted to highlight several key components of your plan that are noteworthy in comparison to other plans we have reviewed:

- Increasing efficiencies in the allocation of workforce investments to focus on areas where there are skill shortages and the potential for fast growing occupations.
- Identifying clear linkages to economic development.
- Emphasizing the important role of business as a customer and a partner through the planned collaboration with the eight local chambers of commerce's.
- Focusing investment on needed funds for training, including a focus on on-the-job training (OJT) programs.

I congratulate you on the important progress you have made in redefining Maine's workforce system I look forward to tracking your future progress. Please contact me if you have questions or if we may be of assistance.

Sincerely,

Randy Ford  
Policy Director, CWS

About CWS:

The Coalition for Workforce Solutions (CWS) is a national coalition uniting organizations that provide support for the nation's workforce development system. CWS members include workforce development providers, vendors, consultants and service organizations. CWS members operate and serve One-Stop Career Centers, Temporary Assistance for Needy Families initiatives, career and technical education programs, and technology and learning services.

## Sardano, Timothy J

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**From:** Suzanne McKechnie <director@visitthekennebunks.com>  
**Sent:** Tuesday, March 12, 2013 4:47 PM  
**To:** DOL, SWIB  
**Subject:** support for workforce investment plan

To Whom it may concern;

I ask that you re-enter into the record, the letter of support that the Kennebunk Kennebunkport Arundel Chamber of Commerce(KKACC) previously submitted. Let it be known that KKACC continues to support the Governor's workforce investment plan to more effectively distribute job training funds and to work more closely with local Chambers of Commerce.

Respectfully,

Suzanne McKechnie  
Executive Director  
Kennebunk-Kennebunkport-Arundel  
Chamber of Commerce  
17 Western Avenue  
Kennebunk, ME 04043  
[www.visitthekennebunks.com](http://www.visitthekennebunks.com)  
207.967.0857



**Sardano, Timothy J**

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**From:** Suzanne McKechnie <director@visitthekennebunks.com>  
**Sent:** Tuesday, January 29, 2013 5:46 PM  
**To:** DOL, SWIB  
**Subject:** Workforce

The Kennebunk Kennebunkport Arundel Chamber supports regional efforts and will work together with neighboring Chambers in our Maine Beaches Region for this workforce initiative. Please contact me with any questions or assistance as needed. 207-967-0857 Respectfully, Suzanne McKechnie Executive Director, Kennebunk Kennebunkport Arundel Chamber of Commerce

*Suzanne McKechnie  
Executive Director  
Kennebunk, Kennebunkport, Arundel Chamber of Commerce  
[www.visitthekennebunks.com](http://www.visitthekennebunks.com)*

*Sent from my Verizon Wireless 4G LTE DROID*

## Sardano, Timothy J

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**From:** Mary Ellen Barnes <mbarnes@lcrpc.org>  
**Sent:** Tuesday, March 12, 2013 5:00 PM  
**To:** DOL, SWIB  
**Subject:** comments on State WIA plan  
**Attachments:** LCPRC Comment letter Jan 2013 State WF Plan.doc

Hello:

Thank you for providing a summary and highlights of the changes proposed in the State WIA Plan. As you can see from the late arrival of my email, the time available to fairly review and appreciate how this revised plan will be implemented is a challenge in the allowed timeframe. I sincerely think it's hard for the public and for publicly-involved economic development professionals to provide you with the thoughtful feedback that this important initiative requires. So I will re-submit my January letter, more as a placeholder for concern. What remains for me is that the revised process for CLEO and LWIB involvement is proposed to occur after the Strategic Plan is approved, rather than earlier in the Plan development, as I have mentioned before and which would be more effective.

Sincerely,  
Mary Ellen Barnes

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*Mary Ellen Barnes*  
*Economic and Community Development Director*  
*Lincoln County Regional Planning Commission*  
*35 Water Street*  
*P. O. Box 268*  
*Wiscasset, ME 04578*  
*207-882-5188*  
[mbarnes@lcrpc.org](mailto:mbarnes@lcrpc.org)  
[www.lcrpc.org](http://www.lcrpc.org)



## LINCOLN COUNTY REGIONAL PLANNING COMMISSION

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35 Water Street • PO Box 268 • Wiscasset, Maine • 04578-0268

January 28, 2013

Maine State Workforce Investment Board  
120 State House Station  
Augusta, Maine 04333

Dear SWI Board,

I offer a few comments on the revised WIA State Plan as economic development director in Lincoln County (our office has participated on the Coastal Counties LWIB for several years). In Lincoln County, workforce development is essential to our small businesses—it's key to strengthening the skills of our increasingly older workers, and to attracting innovative businesses and younger residents. We collaborate with Goodwill NNE, MOST, other job-training programs, and local chambers, exchanging information and opportunities.

I appreciate that the SWIB and the Governor are attempting to insure close business/workforce training relationships, expand training and education opportunities, and increase program consistency statewide. These are also the goals and practices shared by LWIBs.

There is already strong teamwork among industry and workforce stakeholders in the Coastal Counties area, as many observed in reviewing the Draft Plan of last summer. The CCWI professional staff and dedicated board continually engage industry leaders in program design and evaluation, and frequently present research and data to help program planning and customer service stay up-to-date. From my experience, and contrary to what's stated in the revised State Plan, in this six-county region there is an excellent mix of private and public partners and geographic diversity among the industries, County Commissioners (from York to Waldo Counties), economic development agencies (our office, city and regional ED agencies) along with providers, colleges, and state agencies. There is significant accountability, with documentation, benchmarks and grant conditions tracked and publicly available.

With proven and improving services and systems in place, it does not seem collaborative or effective to propose a major overhaul of these successful public/private workforce partnerships without the participation or consultation of the CLEOs and the LWI Boards. In addition, how will the scarce resources – federal dollars and competent personnel – be allocated to a larger number of boards and additional one-stop delivery centers? Will the federal funds be increased – is there a planned investment by the State? Has any practical analysis been done in all the regions of the state about actual operations, work flow, and budgets?

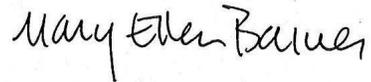
There is huge variation in the staffing and services offered by the State's many chambers and business associations. The eight-region Chamber Map in the Plan does not accurately represent the chambers in Lincoln County – and there's no single chamber representing the entire Mid-Coast area. In fact in our rural county, there are at least five chambers and one strong business association. How will the new plan insure consistency among these quite diverse groups, many with limited capacity? I'm uncertain how local chambers will specifically be engaged – in terms of their work plan and finances, or how the proposed structure will improve efficiencies and on-the-ground service to businesses and workers. It would seem a more responsible approach would be to

improve agreements and service coordination among current LWIBs, which have skilled personnel and and streamlined training development processes.

Rather than strengthen relationships between job training programs and local businesses, this plan is likely to set back cooperative relationships between industry and providers that have been built on straightforward communications, cost-efficiency, and ultimately – effectiveness in the workplace. A Workforce Investment Act Strategic Plan for the State would be considerably more realistic and more effective with substantive planning and dialogue among the SWIB, the LWI boards, and elected officials.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Mary Ellen Barnes". The signature is written in a cursive, flowing style.

Mary Ellen Barnes  
Economic and Community Development Director