

Date/Time	Public Comment Feedback Provided	Feedback on Comment	Modification in Plan
<p>3/7/2026 8:57</p>	<p>Nearly 40% of Kentuckians over age 16 are not in the labor force.</p> <p>Yet WIOA programs largely serve: --individuals already seeking employment --individuals already in training pipelines</p> <p>They rarely reach: --people who have disengaged from work entirely --caregivers --rural workers --people with transportation barriers</p> <p>Result: The system often serves the easiest-to-place participants rather than activating the largest untapped labor pool.</p> <p>Education Gaps Continue to Limit Workforce Outcomes</p> <p>Kentucky has lower educational attainment than the national average: --36.2% of Americans have a bachelor’s degree or higher --27.8% of Kentuckians do</p> <p>This gap limits the types of industries that can expand in the state and makes workforce development more difficult.</p> <p>Workforce Programs Focus on Training Instead of Talent Attraction</p> <p>A major gap in the WIOA system is that it assumes workforce development comes only from training existing residents.</p> <p>However, many growing economies succeed through: --talent attraction --immigration relocation incentives --remote worker recruitment</p> <p>WIOA does almost nothing in these areas.</p> <p>Workforce Programs Are Not Designed for Rapid Economic Growth</p> <p>Kentucky is experiencing major economic investment: --billions in manufacturing and EV investments</p>	<p>WIOA cannot be the only workforce development approach.</p> <p>Kentucky has embraced collaboration among local, regional, and state workforce development providers to achieve impact beyond WIOA. One example is the work of the Education and Workforce Collaborative.</p>	<p>None</p>

	<p>--thousands of new jobs being announced</p> <p>But WIOA programs operate on: --federal grant cycles --slow contracting processes --rigid eligibility requirements</p> <p>Problem: The workforce system cannot move at the speed required for modern economic development projects.</p> <p><i>Public comment submission received from an anonymous submitter.</i></p>		
<p>3/7/2026 12:00</p>	<p>Creation of 68,000 jobs is a bit of a stretch/exaggeration, considering many of the so-called big projects never panned out as promised, i.e., Blue Oval. The fact that you do not want to target the SNAP recipients is a slap in the face to the taxpayers of this state. We have one of the lowest employment participation rates in the country, and this is a large root cause. The declining birth rate over the last 2 decades is not rebounding for at best another decade. Allowing able-bodied people to just sit at home and collect benefits without trying to get a job and contribute to society is basically FRAUD</p> <p><i>Public comment submission received from an anonymous submitter.</i></p>	<p>Job creation figures are based on company commitments and long-term projections, and while many expansion and new location projects develop in phases, they are expected to deliver meaningful economic impact over time.</p> <p>SNAP Employment and Training (E&T) and other human services programs offered at Kentucky Department for Community Based</p>	<p>None</p>

		Services (DCBS) are engaged and working with the public workforce system.	
3/10/2026 6:16	<p>After initial review of document, the incidence of autism in Kentucky was noted. The autism continuum represents a wide range of functioning. There is a high incidence of individuals that are non-verbal/non-speaking and require accommodation to communicate needs and wants. There are individuals with autism that have intellectual disabilities. There are individuals that function at different levels who live independently, pursue advanced education and professional employment. Please include statistics, specific goals/objectives that represent the unique needs of all the groups.</p> <p><i>Public Comment submission received from tynerwilso@aol.com</i></p>	The Kentucky Office of Vocational Rehabilitation (OVR) is in the process of conducting its triennial statewide needs assessment that will be included in the next state plan submission. We will include in the Comprehensive Statewide Needs Assessment (CSNA) data specific to the target audience identified. OVR will note the specific goals/objectives representing the unique needs of all disability groups.	None
3/14/2026 10:06	<p>Policy changes that are being made within the Office of Vocational Rehabilitation that is negatively impacting the services received by autistic college students. The extra strain and the many requirements of different forms of documentation is not providing a service to individuals with disabilities. It is impacting negatively mental health and taking time away from other responsibilities and obligations just to gather the documentation and be asked for more after the previous requested documents have been submitted. Instead of clear instructions that I have requested for what they need, I have been getting the same repeated answer that does not clarify much of anything. I need a comprehensive list but keep being asked for some at a time just for more to be added. The process of attempts to resolve this matter is unnecessarily lengthy and complicated. Being kept in the dark about decisions made of one's own life is cruel and depletes the trust in the system that is supposed to be there to help. It feels as though I am being strung along until I give up.</p> <p><i>Public Comment submission received from shea.ryan-kessler750@topper.wku.edu.</i></p>	With the implementation of Order of Selection due to increased numbers served and higher case service expenditures, OVR reinstated financial participation for all individuals who are eligible for services. This process is applied consistently to every individual applying for services. OVR provides the worksheet and step-by-step instructions for financial participation calculation on the OVR website. If you are not receiving the needed information and clarification of the process from your VR counselor, please reach out to KristenG.Beach@ky.gov , JonathanT.White@ky.gov	None

		<p>or HollyB.Hendricks@ky.gov</p>	
<p>3/23/2026 13:36</p>	<p>Thank you for the opportunity to comment on Kentucky's 2024-2027 WIOA State Plan. I am submitting this feedback as a staff member of the Prichard Committee for Academic Excellence. Kentucky's independent education policy organization in recognition of the substantial common ground between KWIB's four strategic goals and the work currently underway through Kentucky's Meaningful Diploma initiative.</p> <p>The plan articulates a workforce development vision centered on aligning education with industry demands and preparing Kentuckians for the future of work. I want to affirm that vision and offer perspective on a structural gap that, if addressed, would meaningfully strengthen the system's ability to achieve Goals 1 and 2: the K-12 institutional layer.</p> <p>Goals 1 and 2 both identify work-based learning as a top strategic priority from both the employer and learner perspectives. The plan correctly recognizes that WBL expansion requires clear guidance, accessible funding, and networks of practice. What the strategies do not yet fully address is the upstream institutional challenge: Kentucky's high schools are not yet systematically preparing students to recognize, evaluate, or take full advantage of WBL opportunities. The Prichard Committee's statewide employer survey conducted as part of the Meaningful Diploma initiative found that 83.7% of employers see K-12 partnerships as essential, yet only 19.8% engage regularly with schools, and only 21.4% currently offer WBL. The demand-side gap is real, but so is a readiness gap on the learner side.</p> <p>Our research and engagement across Kentucky schools and employers consistently points to the same structural finding: the WBL programs that work those with durability, reach, and genuine career relevance are almost always anchored by a dedicated staff member or small team within the school or district whose primary responsibility is maintaining program fidelity and growing employer relationships. Without that staffing infrastructure, even well-resourced WBL initiatives tend to plateau or erode as the coordinators who built them change roles. This is not a peripheral implementation detail; it is the mechanism through which WBL becomes institutionalized rather than episodic. The WIOA plan's strategies for WBL expansion would be strengthened by explicitly naming</p>	<p>Work-Based Learning (WBL) is a priority for workforce development and levers within WIOA-- such as job training and registered apprenticeships-- are important strategies.</p> <p>Furthermore, initiatives such as Everybody Counts provide an avenue for schools to be supported through skilled professionals who complement existing WBL K-12 experts.</p> <p>The KWIB and partners would welcome collaboration with the Prichard Committee on achieving Goal #2, Education Attainment.</p>	<p>None</p>

dedicated school- or district-level WBL coordination capacity as a necessary condition and by aligning workforce development funding streams to support it.

This connects directly to the counselor capacity issue that the plan gestures toward but does not fully resolve. Kentucky's current 348:1 student-to-counselor ratio undermines not only individual advising but the infrastructure for ILP implementation and WBL coordination. Counselor investment is not only an education equity issue it is a direct workforce development lever. Students who receive substantive, ongoing navigation support are significantly more likely to pursue postsecondary credentials and WBL placements that lead to economic mobility.

A few additional connections worth naming:

On Goal 2's postsecondary attainment target (60% of Kentuckians with a credential by 2030): The Meaningful Diploma initiative positions high school transformation as the most scalable upstream lever for postsecondary credential attainment. The WIOA plan would be strengthened by explicitly naming K-12 institutional reform not only individual attainment programs as a strategy for reaching this goal.

On disconnected youth: The plan identifies youth ages 16-24 as a priority population. Approximately 1 in 7 Kentuckians in that range is neither in school nor working. Meaningful Diploma's focus on 9th Grade On-Track indicators, ILP implementation beginning in 6th grade, and early postsecondary momentum addresses the conditions that produce disconnection before it occurs a prevention strategy that complements WIOA's intervention strategies and would reduce the population the workforce system ultimately needs to serve.

The Prichard Committee's Meaningful Diploma initiative including its Steering Committee networks, existing relationships with KDE's CTE standards process, the Kentucky Chamber of Commerce, and the General Assembly represents ready-made infrastructure for advancing these goals. I hope this feedback is useful as the plan continues to evolve, and I welcome any opportunity to discuss further how these efforts might be aligned.

*Public comment submission received from
kyle@prichardcommittee.org.*

<p>3/25/2026 11:44</p>	<p>Public Comment on WIOA State Plan Kentucky Office of Vocational Rehabilitation (OVR)</p> <p>I am writing to express serious concern regarding the financial participation changes being implemented within the Kentucky Office of Vocational Rehabilitation (OVR), as referenced in the WIOA State Plan. While the plan notes compliance with federal regulations under 34 CFR Part 361, it does not clearly define how financial participation will be calculated, who will be impacted, or how exemptions will be applied in practice.</p> <p>This is not just a policy gap. It is a real risk to people.</p> <p>Through my work in data analysis, disability support programming, and direct involvement with the Kelly Autism Program (KAP) at Western Kentucky University, I have seen firsthand what happens when barriers are removed and what happens when they are introduced.</p> <p>KAP demonstrates what is possible when access is consistent, predictable, and intentionally supportive. Students in the program achieve a 90.3% semester-to-semester retention rate and a 61.3% graduation rate, compared to national estimates of 20-40% for autistic students without structured support systems. These are not just statistics. They represent students who stayed when they might have dropped out, who graduated when the odds were against them, and who moved toward independence instead of falling through gaps.</p> <p>Those outcomes are built on one principle: access without hesitation.</p> <p>Students engage because they know support will be there. They do not have to calculate whether they can afford to ask for help. They do not have to delay services until a financial decision is made. They do not have to weigh their future against their bank account.</p> <p>Introducing financial participation especially without clear, accessible guidance changes that dynamic entirely.</p> <p>It introduces hesitation.</p> <p>And hesitation is where systems begin to fail.</p> <p>A student does not sign up for services immediately because they are unsure what it will cost.</p>	<p>With the implementation of Order of Selection (OOS), the Office of Vocational Rehabilitation (OVR) reinstated financial participation (formerly called cost sharing). This requirement follows federal regulations (34 CFR 361.54) and is explained in Kentucky's regulations (781 KAR 1:020). OVR also provides the worksheet and step-by-step instructions for financial participation calculation on the OVR website that figures for 250% poverty level figures.</p>	<p>None</p>
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A student skips a meeting, delays requesting assistive technology, or avoids transportation support because they are worried about financial responsibility.

A student tries to figure it out alone for just a few weeks and those weeks turn into falling behind, disengaging, and eventually leaving.

From a data perspective, this is predictable. From a human perspective, it is devastating.

Because the individuals served by OVR are not starting from a level playing field. Many are already navigating financial strain, academic pressure, social barriers, and the additional costs associated with disability. Financial participation does not exist in isolation it stacks on top of all of these realities.

Even small costs can become breaking points.

Consider a student who is technically above a low-income threshold but still living paycheck to paycheck. That student may not qualify for full support, but they also do not have the financial flexibility to absorb new expenses. They are placed in a space where services are available on paper but inaccessible in practice.

Consider an individual in a rural area who already struggles with transportation access. If financial participation extends to transportation or related supports, the cost of simply reaching services may outweigh the perceived benefit.

Consider someone with higher support needs who requires multiple services simultaneously job coaching, assistive technology, therapy coordination. Even if each service has a manageable cost individually, the combined burden becomes overwhelming.

These are not edge cases. These are common realities.

And when individuals disengage from services due to financial uncertainty, the consequences extend beyond the individual. They directly impact the outcomes the state is trying to achieve.

The WIOA State Plan emphasizes performance indicators such as employment rates, earnings, credential attainment, and measurable skill gains. However, these outcomes are downstream results. They depend entirely on whether individuals can consistently access services in the first place.

If access is reduced, outcomes will follow.

We cannot expect higher employment outcomes while simultaneously making it harder for individuals to engage in the services that lead to employment.

We cannot expect increased credential attainment while introducing barriers that cause students to drop out or delay progress.

We cannot expect measurable skill gains if individuals are unable to fully participate in training, internships, or support programs due to cost.

There is also a less visible, but equally important impact: trust.

Programs like OVR and KAP work because individuals trust that the system is there to support them. When policies become unclear or financially burdensome, that trust erodes. Individuals begin to question whether seeking help will create additional problems instead of solving them.

And once that trust is lost, it is incredibly difficult to rebuild.

From both a data-driven and human-centered perspective, the conclusion is the same:

barriers reduce engagement, and reduced engagement weakens outcomes.

If Kentucky is serious about improving workforce participation, supporting individuals with disabilities, and meeting WIOA performance goals, then policies must reinforce access not complicate it.

I strongly urge the state to:

Clearly publish all financial participation formulas, thresholds, and exemptions in plain, accessible language

Conduct and share a detailed impact analysis on how these changes will affect service utilization, retention, and employment outcomes

Ensure that no individual is delayed, discouraged, or excluded from services due to financial uncertainty or inability to pay

Protect individuals who fall outside strict low-income definitions but still lack financial flexibility

Align all financial policies with the demonstrated success of programs like KAP, where reduced barriers directly correlate with improved outcomes

Vocational Rehabilitation is meant to be a pathway to education, to employment, to independence, and to a better life.

For many individuals, it is not just a program. It is the difference between moving forward and being left behind.

Policies that introduce uncertainty or financial burden at the point of access risk closing that pathway for the very people it was designed to support.

We know what works. We have the data. We have the outcomes.

Now the policy must reflect that.

Thank you for the opportunity to provide comment.

Public comment submission received from alexsbentley@gmail.com.

<p>3/25/2026 22:56</p>	<p>SUBJECT: Public Comment on Kentucky WIOA State Plan Modification, Program Years 2026-2027</p> <p>Submitted by: The Scaffold Initiative 612 Dusk Ridge Road, Collierville, TN 38017 thescaffoldinitiative.org outreach@thescaffoldinitiative.org</p> <p>Submitted to: Kentucky Workforce Innovation Board (KWIB)</p> <p>Date: March 25, 2026</p> <p>I. Organizational Identity</p> <p>The Scaffold Initiative is a 501(c)(4) social welfare organization incorporated in Wyoming (EIN 41-4911679, WY SOS 2026-001921360) and operating nationally, with organizational leadership based in Memphis, Tennessee and a mission focused on expanding AI and digital workforce readiness for workers facing displacement or barriers to economic mobility. Our Executive Director, Ricky Tucker, is a workforce development practitioner with over 40 years of experience in adult education, business coaching, and career development, based in Memphis, Tennessee.</p> <p>II. Support for the Plan Modification</p> <p>We commend Kentucky for undertaking the PY 2026-2027 State Plan modification and write to offer substantive input on the following priorities established by Training and Employment Guidance Letters 07-25 and 05-25. Kentucky's decision to engage in this modification cycle reflects a commitment to aligning its workforce system with evolving federal priorities, and we appreciate the opportunity to contribute to that process.</p> <p>III. Priority Recommendation: AI Literacy as a Foundational Workforce Competency</p> <p>TEGL 07-25's Pillar V explicitly calls for states to prioritize "AI literacy and skills development across the public workforce system" and create "new models of workforce innovation built to match the speed and scale of AI-driven economic transformation." We urge Kentucky to:</p> <ol style="list-style-type: none"> 1. Designate AI literacy as a core competency within the state's eligible training provider framework, enabling WIOA Individual Training Account (ITA) funds to cover structured AI skills programming. 	<p>Understanding artificial intelligence or AI is changing the dynamics of work. KWIB launched and completed an AI task force focused on opportunities for workers, learners, and businesses. This task force is mentioned in the WIOA State Plan, with recommendations that will be reviewed by Education and Labor Cabinet (ELC) and the executive branch.</p>	<p>None</p>
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2. Include AI and digital skills benchmarks in the state's Measurable Skill Gains performance indicators for PYs 2026-2027, consistent with the credential attainment and measurable skills gains reporting required under WIOA Section 116.

3. Partner with community-based organizations that provide contextualized AI training particularly for adult learners, dislocated workers, and youth rather than limiting technology training to institutional providers.

Kentucky faces a particularly consequential moment for workforce strategy. The state's economy sits at the intersection of two major transitions: the ongoing decline of coal and fossil fuel employment in eastern Kentucky, and the rapid automation of the advanced manufacturing sector that has become a pillar of the state's economic identity including major automotive assembly operations from Toyota, Ford, and their supplier networks. Workers displaced from coal communities need accessible pathways into new industries, and workers in manufacturing need to develop competencies alongside increasingly AI-augmented production environments. At the same time, Kentucky's growing logistics and distribution sector driven by its central geographic position and major hubs like UPS Worldport in Louisville is deploying AI-driven supply chain, routing, and warehousing systems at scale. A deliberate AI skills strategy within the WIOA plan would serve all three populations: transitioning energy workers, manufacturing incumbents, and logistics workers. Investing in AI literacy now positions Kentucky to lead the narrative on economic transition rather than react to displacement.

IV. Priority Recommendation: Worker Mobility and AI-Powered Tools

TEGL 07-25's Pillar II calls for states to integrate "AI-powered tools including comprehensive talent marketplaces composed of comprehensive learner records or learning and employment records solutions, credential registries, and skills-based job description generators." We recommend:

1. Kentucky adopt or pilot a competency-based AI skills credential recognizable across Kentucky Career Centers for job matching purposes.
2. Kentucky Career Center staff receive training on AI tools and be empowered to recommend AI-augmented job search and skills assessment tools to participants.

V. Priority Recommendation: Waiver Authority for AI Pilot Programs (TEGL 05-25)

Under TEGL 05-25's waiver framework, Kentucky has authority to request waivers that enable innovative AI-readiness pilot programs. We specifically recommend Kentucky explore a waiver allowing On-the-Job Training (OJT) reimbursement to extend to AI skills roles in non-traditional settings, consistent with TEGL 05-25's encouragement to raise OJT reimbursement caps and expand incumbent worker training. Given Kentucky's significant population of workers transitioning out of the coal industry and into new economic sectors, such a waiver could enable structured AI skills training embedded in real employment settings accelerating reemployment rather than requiring workers to complete training before seeking new positions.

VI. The Scaffold Initiative's Capacity

The Scaffold Initiative is developing capacity to serve as a community partner in implementing AI and digital literacy training integrated with public workforce systems nationwide. As a nationally operating organization, we are committed to building capacity in service of Kentucky's workforce goals. We offer:

- Curriculum and facilitation for AI/digital skills training aligned to employer demand
- Train-the-trainer capacity for Kentucky Career Center staff
- Partnership development with regional employers to validate competencies and create hiring pipelines

We welcome the opportunity to engage further with the Kentucky Workforce Innovation Board.

Respectfully submitted,
Ricky Tucker
Executive Director, The Scaffold Initiative
outreach@thescaffoldinitiative.org
thescaffoldinitiative.org

*Public comment submission received from
outreach@thescaffoldinitiative.org.*

4/2/2026
13:19

To the Kentucky Workforce Innovation Board and the Kentucky Education and Labor Cabinet:

Thank you for the opportunity to provide input on the Workforce Innovation and Opportunity Act (WIOA) State Plan Modification. I appreciate the Commonwealth's continued commitment to expanding Registered Apprenticeship (RA) as a core workforce strategy.

The State Plan appropriately recognizes Registered Apprenticeship as a key driver of workforce development, emphasizing:

Expansion of work-based learning models and apprenticeships

Strong collaboration across workforce and education partners

The role of the Kentucky Career Center as a statewide connector for apprenticeship opportunities

Additionally, the plan already deems Registered Apprenticeship programs as automatically eligible for the Eligible Training Provider List (ETPL) and serve as an effective tool to meet employer demand across sectors. These are important and commendable foundations.

While the plan emphasizes statewide coordination, Registered Apprenticeship sponsors that operate across multiple workforce areas often encounter variability in local implementation.

It is important to emphasize that this is not a criticism of local workforce development boards. Organizations such as the Kentucky Rural Water Association (KRWA) maintain strong, collaborative relationships with several workforce boards across the Commonwealth, and those partnerships are essential to successful program delivery.

However, the structure of WIOA allows for local policy variation, which can unintentionally result in:

Different funding eligibility criteria between regions

Duplicative administrative requirements

Inconsistent access to training and supportive services

A more standardized statewide framework would not replace

As Kentucky's registered apprenticeship program continues to grow, ensuring support and consistency for employers across the commonwealth is accomplished through the Office of Industry and Apprenticeship Services. With a dedicated apprenticeship consultant team, the commonwealth can help companies navigate local differences, assist in maximizing all available resources, and provide consistent service.

None

local flexibility; it would provide clearer guidance and consistency for both workforce boards and apprenticeship sponsors. Further, it would reinforce the current strategic plan's stated goal to avoid silos of excellence and create a system of excellence.

This issue is not exclusive to Kentucky. I would like to provide some national context and a shared challenge across states.

The Kentucky Rural Water Association serves as the statewide sponsor for its Registered Apprenticeship Program and is part of a national network (through National Rural Water Association) of 36 state rural water associations that operate active apprenticeship programs. Each established program works with participating employers statewide in our respective states. Across this network, a consistent theme has emerged:

Navigating differing local workforce board policies is one of the most common barriers identified by state apprenticeship coordinators.

This places Kentucky in a unique position not only to address this challenge internally, but to become a national model for how states can effectively support statewide apprenticeship sponsors.

Several states have already taken steps to address this issue through statewide policy alignment:

Wisconsin has implemented uniform statewide policies that ensure Registered Apprenticeship programs are consistently recognized and supported across all workforce regions

North Carolina has leveraged state-level WIOA funding set-asides to guarantee baseline support for apprenticeship programs statewide

Michigan utilizes Governor's reserve funds to invest in apprenticeship expansion, reducing reliance on varying local priorities

These approaches demonstrate that states can maintain local flexibility while providing stronger statewide direction and consistency.

An update to the strategic plan would also provide an opportunity to clarify the use of WIOA Training Services for Registered Apprenticeship Programs (TEGL 3-15).

Federal guidance under TEGL 3-15 clearly establishes that Registered Apprenticeship programs are uniquely positioned within WIOA and allows for multiple training service strategies to be used concurrently.

This includes:

Individual Training Accounts (ITAs) for related technical instruction

On-the-Job Training (OJT) contracts with employers

A combination of ITA + OJT

Incumbent Worker Training for apprentices already employed

Supportive services in coordination with training

Importantly, this guidance reinforces that participants already employed and enrolled in a Registered Apprenticeship program are eligible to receive WIOA-supported training and services. In current practice, some local workforce areas do not support apprentices who are already employed because they were not enrolled in WIOA prior to employment.

Providing clear statewide guidance reinforcing this federal flexibility would:

Expand access to apprenticeship support

Align local practice with federal intent

Remove a common barrier faced by employers and sponsors

Standardizing Point of Exit for Apprenticeship Participants

Registered Apprenticeship programs typically range from one to six years, which differs significantly from traditional WIOA training models. As a result, participants often exit WIOA before completing their apprenticeship. Local workforce areas may have uncertainty around how to manage exits while maintaining strong performance outcomes. The length of apprenticeship programs should not be viewed as a barrier to success.

However, clear statewide guidance on defining and managing the point of exit would:

Provide consistency across workforce areas

Help maximize performance outcomes under WIOA metrics

Increase confidence among workforce boards in supporting apprenticeship programs

Establishing a standardized approach to exit for Registered Apprenticeship participants would be highly beneficial for both program administration and performance accountability.

Recommended Policy Enhancements

To build on the strong foundation already established in the State Plan, I respectfully recommend the following:

1. Establish Uniform Statewide Guidance for Registered Apprenticeship

Provide clear, statewide direction that limits unnecessary variation in how apprenticeship programs are evaluated and funded

Ensure consistent access to WIOA-funded services across all workforce areas

2. Recognize and Support Statewide Apprenticeship Sponsors

Formally acknowledge the role of statewide sponsors that serve multiple regions

Streamline processes so these sponsors do not need to navigate duplicative requirements in each workforce area

3. Clarify Allowable Use of WIOA Funds for Apprentices

Reinforce that multiple training strategies (ITA, OJT, incumbent worker training) may be used

Clearly state that apprentices already employed are eligible for support

4. Provide Guidance on Apprenticeship Exit Policies

Establish a consistent, statewide approach to participant exit

Ensure alignment with WIOA performance requirements while recognizing the long-term nature of apprenticeship

5. Provide State-Level Funding Support for Apprenticeship

Utilize Governor’s Reserve Funds or other statewide mechanisms to support:

- o Related Technical Instruction (RTI)
- o On-the-Job Training (OJT)
- o Supportive services

This would create a baseline level of support statewide, while still allowing local boards to enhance services.

6. Improve Alignment Through Statewide Expectations

Establish clear expectations and guidance for workforce boards on supporting apprenticeship

Encourage consistent implementation while preserving local partnerships and flexibility

Kentucky has made meaningful progress in advancing Registered Apprenticeship as a workforce solution. By addressing the challenge of inconsistent local implementation, the Commonwealth has the opportunity to:

Better support statewide apprenticeship sponsors

Provide clearer guidance to local workforce boards

Expand access to apprenticeship opportunities across all regions

Most importantly, Kentucky can position itself as a national leader in building a coordinated, statewide apprenticeship system that works effectively for employers, workforce partners, and participants alike.

Thank you for your consideration and for your continued commitment to strengthening Kentucky’s workforce.

*Public comment submission received from
h.stevenson@krwa.org.*