



WISCONSIN

Agricultural Outreach Plan

Program Year 2014
July 1, 2014 - June 30, 2015



State of Wisconsin Program Year (PY) 2014 Wagner-Peyser (WP) Act Agricultural Outreach Plan (AOP)

Activities Planned For Providing Services to Agricultural Employers and Migrant Seasonal Farmworkers (MSFWs)

Wagner Peyser (WP) Agricultural Outreach

Each state workforce agency shall operate an outreach program in order to locate and to contact MSFWs who are not being reached by the normal intake activities conducted by the local offices. To this end, each state agency must include in its State Operational Plan an annual agricultural outreach plan, setting forth numerical goals, policies, and objectives. Regulations at 20 CFR 653.107 require that the outreach plan include the following elements:

- *Assessment of need*
- *Proposed outreach activities*
- *Services provided to agricultural employers and MSFWs through the American Job Center system*
- *Numerical goals*
- *Data analysis*

Background:

As required by 20 CFR Subpart B, 653.107, the Department of Workforce Development (DWD) will provide WP Act-funded services to migrant workers, prospective employers and current employers of MSFWs. The Department of Workforce Development has created a unified MSFW program to ensure that funds are used efficiently. This is a collaborative effort between two bureaus of DWD's Division of Employment and Training (DET): the Bureau of Job Service (BJS) and the Bureau of Program Management and Special Populations (BPMSP). Our mission is to support Agricultural employers and farmworkers through an effective labor exchange system and ensure that employer and worker stakeholders are aware of their rights, responsibilities and protections using an efficient and collaborative service delivery process.

The DWD MSFW Program will continue efforts to strengthen its working relationships with MSFWs and employers so that each better understands how the Public Labor Exchange (Job Centers), outreach services and the Migrant Law Enforcement unit (MLE) can be of assistance. Efforts will continue to include job order services (including intra/interstate) to employers and the full range of Job Service (JS) Public Labor Exchange services delivered via an Outreach Program designed to locate, contact, and inform migrant and seasonal farmworkers about the their rights and availability of service.

As required by 20 CFR Subpart B, 653.101, DWD will ensure that MSFWs are offered the same range of employment services, benefits and protections that are provided to non-MSFWs including counseling, testing and job training referral services. To assure statewide compliance, DWD will make every effort to meet the Equity Indicators of Compliance as well as the Minimum Service Level Indicators. Wisconsin is designated as a "significant" state, and as such every effort will be made to conduct vigorous outreach activities in the significant MSFW service areas located in Wautoma and Beaver Dam. Wisconsin will also continue its statewide outreach efforts beyond Wautoma and Beaver Dam to ensure migrant workers around the state have access to Job Service information and the wide array of Job Center services.

The Bureau of Program Management and Special Populations (BPMSP) through its Migrant Law Enforcement (MLE) unit also provide additional services to workers and employers. The MLE unit enforces the Wisconsin Migrant Labor Law on behalf of individuals who travel to Wisconsin for employment in agriculture, horticulture and food processing and work in this state for less than ten months per year. The Wisconsin

Migrant Labor Law provides standards for wages, hours and working conditions of migrant workers; certification, maintenance and inspection of migrant labor camps; recruitment and hiring of migrant workers and guarantees the right of free access to migrant camps. The MLE unit also provides technical assistance to covered employers to promote compliance.

A. Assessment of Need

MSFW activity and MSFWs projections for PY 2014

Total MSFWs registrations in Wisconsin for PY 2013 were 996. Interstate and intrastate clearance order activity via the Agricultural Recruitment System (ARS) received or initiated were minimal and were linked to criteria job orders. Our outreach to MSFW employers has created some interest in the use of ARS. However, we anticipate minimal ARS activity or employer usage of the system outside those linked to criteria orders.

Based on PY 2013 data (July 1, 2013 through June 30, 2014), 283 agricultural job orders and 1,327 job openings were received.

The MLE unit census indicates that there were 3,867 migrant workers employed in seasonal agriculture, horticulture and food processing by state law definition (Calendar year 2013). The MLE program also certified 82 migrant camps, performed 13 post occupancy inspections, 3 field sanitation inspections, 8 payroll reviews, 30 work agreement reviews, and monitored known crew leaders in the state.

The latest data supplied by United Migrant Opportunity Services, a WIA 167 National Farmworker Jobs Program (NFJP) grantee, indicates that the organization served / identified a total of 1460 migrants or 552 families for the year 2013.

Based on current economic, weather and other conditions we estimate that a similar level of activity will occur during PY 2014.

Agricultural activity and projections for PY 2014

According to the *2013 Wisconsin Agricultural Statistics* report by the National Agricultural Statistics Service and the Department of Agriculture and Consumer Protection, Wisconsin was among the top 10 producers of corn for grain and silage, oats, potatoes, cherries -tart, strawberries, maple syrup, cranberries, mint, cabbage, and cucumbers as well as the following for processing: carrots, sweet corn, green peas and snap peas. Wisconsin remained the top cranberry producing state, with 60% of the national production.

American ginseng has been cultivated in Wisconsin for more than 100 years. Today Wisconsin ginseng farmers account for 95% of the total cultivated ginseng production in the United States. The ideal growth conditions in Marathon County have made it the ginseng capital of the United States.

According to the *Organic Agriculture in Wisconsin: 2012 Report (Note: 2013 Report is not yet available)* Wisconsin is a national leader in organic vegetable production. The number of Wisconsin certified organic farms grew 157 percent from 2002 to 2007. Wisconsin is second only to California in the number of organic farms transitioning to organic farming, positioning the state well to grow its future capacity for organic agriculture. Wisconsin is also in the top five states in certified organic acreage with a total of 195,603 acres. The state is also among the top five in production of most major organic crops and livestock types. Wisconsin ranks third in the number of organic vegetable and melon farms, ranks in the top five states for organic berry farms and in the top six for organic fruit/tree nut farms.

There are six main vegetable production regions in Wisconsin:

Region 1: The **Central Sands** vegetable production region is located in the center of the state and is characterized by sandy soils. Main vegetable crops are: potatoes, sweet corn, peas and snap beans.

Region 2: The **Driftless** vegetable production region is located along the western border of Wisconsin and is characterized by bluffs and hilly terrain. Vegetable farming in this area is characterized by high concentration of fresh market and organic growers.

Region 3: The **lower Wisconsin River** vegetable production region is located in southwestern Wisconsin and is characterized by hilly topography. The main vegetable crops in this area are: sweet corn, peas and snap beans.

Region 4: **Muck** farms are located on drained swamps. They are distributed throughout the state and are characterized by soils with high levels of organic material. The main vegetable crops in this area are: carrots, celery, mint and onion.

Region 5: The **Potato seed** production area is located in Langdale County, near Antigo. Its isolation from commercial potato production areas helps keep disease incidence low. The main vegetable crop is seed potatoes.

Region 6: The **Ripon plain** is a large region of eastern Wisconsin that is characterized by signs of glacial activity, silt loam soils and lime-rich fills. The main vegetable crops in this area are: sweet corn, beans and peas.

In vegetable processing, Wisconsin ranked second in the nation for total production and value of production, but fell from second to third place for harvested acreage. Wisconsin moved into first place for production of carrots for processing and maintained its number one ranking in production of processing snap peas. The state ranks third for the production of processing sweet corn and peas. Food processing activities occur from June to December and are concentrated mostly in the South Central and Eastern Wisconsin areas.

Growing Season Review

According to the *Wisconsin Agricultural Statistics*, 2012 was an unusual year from the start. It opened with a much warmer than normal winter, allowing the growing season an early start followed by extreme heat and drought in the southern half of the state. The heat and moisture stress pushed crops into early maturity well before the first widespread frost of the year hit in the end of September. Dry field conditions allowed harvest to progress quickly.

The 2013 growing season in Wisconsin was an extremely wet and unusually cold spring statewide. Snow and standing water left fields impassible to machinery and multiple freezes damaged overwintered crops. Farmers struggled to finish planting throughout June. Areas of southern Wisconsin reportedly received up to 11 inches of rain in the final week of June, causing localized flooding and crop damage. Despite two brief heat waves, temperatures were below normal for most of July and August with some light frosts reported in northern Wisconsin in mid-August. The rest of the state was well below normal, causing drought conditions to develop across the west. Above average temperatures and rains in September and early October helped to alleviate moisture shortages and push crops toward maturity. Temperatures plunged in the latter half of October, halting the growing season. Multiple rain and snow events slowed fieldwork throughout November.

According to the *2014 Wisconsin Farm Facts*, Wisconsin agriculture contributes more than \$59 billion to Wisconsin's economy every year, supporting almost 354,000 jobs.

We do not foresee big changes in the current levels of agricultural activity or productivity. We project the numbers of MSFWs, crop activities/geographical areas and time frames to remain constant for PY 2014.

B. Outreach Activities

Program Goals for PY 2014

It is DWD's goal to contact a sufficient number of MSFWs with the maximum utilization of resources available. Outreach for calendar year 2012 included 2,596 initial contacts in 72 outreach days. Outreach for calendar year 2013 included 2,592 initial contacts in 55 outreach days. Our goal for PY 2014 is 2,775 initial contacts in 60 outreach days.

Local offices that have MSFW activity in their service areas are required to operate an Outreach Program to contact agricultural and food processing employers to offer labor recruitment assistance via the local order system or the ARS. They are also required to obtain or update each employer's MSFW workforce projections. We plan to continue coordinating our efforts with MSFW partners to meet our outreach goals.

In addition to the above mentioned quantitative goals, we have set two qualitative outreach goals for the DET MSFW Program. The first goal is to increase outreach to agricultural employers and have the outreach staff link employers to the business services units to increase agricultural employers' awareness and use of the Public Labor Exchange services. The second goal is to increase outreach contacts to seasonal workers. Collaboration with MLE inspectors has historically facilitated outreach to migrant workers, as they are covered by the state law. Analysis of the *Census of Agriculture, USDA, National Agricultural Statistics Service*, has shown a need to increase efforts to identify and serve local seasonal workers.

Staff providing outreach services will continue to be three full-time equivalent positions comprised of seven bilingual permanent state employees. Staffs are based at Job Centers or affiliated One Stop System sites and provide customers the full array of core, intensive, and training services. They also provide Job Service information relevant to the needs of the agricultural and food processing community, including but not limited to WIA Title I, WIA 167 and other appropriate program services. This is accomplished in large part through conducting employer-coordinated visits to fields and canneries to meet with MSFWs and provide service information at the beginning and close of the employment seasons. The same information will be shared with the Workforce Development Boards.

The Bureau of Job Service (BJS) has no formal presence at the Job Centers in the significant offices of Wautoma and Beaver Dam. In PY 2013 outreach workers provided outpost hours at both of these sites. We also continued the co-location with our WIA 167 partner (UMOS) in Beaver Dam. For PY 2014, in addition to field activities, we plan to continue providing services in Beaver Dam and Wautoma and co-locating with our WIA 167 partner (UMOS) in Beaver Dam.

In order to maximize resource utilization to achieve PY 2014 goals and beyond, the DET will continue working to increase coordination and efficiency in the provision of services to the MSFWs and their employers. Previously operating as four distinct programs, the DET MSFW Program unifies and coordinates the federally required labor exchange activities of the MSFW Outreach Program, the Foreign Labor Certification (FLC) Program, the Monitor Advocate and the enforcement duties of the MLE Program. Coordination of these four MSFW-centered programs allows DWD to increase productivity of Wagner Peyser-funded activities and to more accurately evaluate and report services provided to agricultural workers and employers.

The DET MSFW Collaborative Workspace has been developed in order to effectively collect, analyze, report, and share program data. Internally, the system collects data regarding outreach visits, field checks, violations, monitoring visits, migrant labor camp status, initial or post occupancy migrant camp inspections, field sanitations, payroll reviews, work agreement reviews, seasonal labor needs and annual population tallies. The MSFW Collaborative Workspace also serves as a statewide hub for MSFW-related information, allowing information to be shared from all our partners including the WIA 167 grantee, legal services and other partners and service providers. The system tracks service referrals as well as complaints and apparent violations statewide. During PY 2014, we plan to continue to make improvements to this site and work on implementing an access agreement with our WIA 167 grantee during PY2014.

WP Act-funded services

The WP Act-funding for services to migrant and seasonal workers, prospective employers and current employers of MSFWs is approximately \$366,000, supplemented by \$162,000 in funding from GPR Migrant Services Funds for a total of \$528,000. This total includes salaries, fringe benefits and other staff related expenses for seven full-time equivalent employees. Seven outreach staff for an equivalent of three full-time equivalent positions [two full-time persons, one in each significant office (Beaver Dam and Wautoma), and the other five persons at approximately 20 percent to this program], the full time State Monitor Advocate, and three full-time Wisconsin Migrant Labor Law Inspectors.

Outreach tools

The majority of the outreach contacts occur through group orientation sessions in person. The sessions are planned and arranged beforehand by the Outreach staff based on their communications with the employers. According to regulations 653.107 (1) – (4), the outreach contacts include the following information: presentation and offer of services, referrals to agricultural and non-agricultural employment, all range of services available from Job Service, information about our tri-lingual call center (English, Spanish and Hmong), Job Service complaint system, and information about federal and state laws and protections available.

Our PY 2014 goal is to continue to increase outreach services to local seasonal and migrant workers. One of those initiatives is to work closely with the Hmong Association to increase our outreach to the Hmong farmworkers.

Outreach contacts and services have been recorded by the outreach, or other appropriate staff, on the following forms: the Migrant Camp Employer Supplement, the Outreach Seasonal Planning Record and hand tallies. These forms are also part of our SharePoint reporting system. We also maintain the Job Service Complaint System Log in SharePoint. This increases the efficiency and accuracy in reporting, as well as the ability to follow up and evaluate program activities.

C. Services Provided to MSFWs through the American Job Center (AJC) Network.

Information is provided during on-site outreach visits. Whenever possible group orientation sessions are planned and arranged beforehand by the Outreach staff. The information, including handouts, presented at these sessions includes:

- Job Service/Job Center services available from local offices, including job information available via the Job Center of Wisconsin website (JCW), Wisconsin's automated self-service registration
- Referrals to agricultural/non-agricultural employment, training, supportive services, testing, counseling, and other job development services
- Farmworker Rights (Federal and State Law, employment related protections)

- Job Service complaint system
- WIA information and potential eligibility information
- Providing referrals and information as to how to contact other organizations servicing MSFWs such as UMOS, local and state Health and Human Services Departments, Legal Action, Migrant clinics, and program services such as FoodShare, Medical Assistance and others

Sessions include time for questions and answers. Outreach workers are aware that this activity can elicit complaints and/or the detection of apparent violations. In instances where group sessions may not be appropriate, outreach staff will contact MSFWs in the traditional individual manner.

Self-Registration

It is mandatory to register in Job Center of Wisconsin (JCW) in order to access the system and utilize tools including job search, job matching, and résumé posting. While Job Service and especially migrant outreach staff continue to register customers and enter services provided into ASSET (the state case management and reporting system), the primary method of registration is customer driven (or staff assisted) registration directly through JCW. All registration information is shared between the two systems.

The ASSET System continues to allow outreach staff to provide staff managed intake and case management capabilities to support a virtual workforce center environment. Using laptops, individual applications are occasionally taken during outreach visits when appropriate. Where necessary, an explanation of the purpose (and sometimes assistance with completion) of the process shall be given during these sessions.

Wisconsin's Unemployment Insurance program also requires mandatory registration on JCW for customers who are mandated to conduct regular work search. Because of this requirement, and potential impacts on unemployment benefits, MSFW Program outreach staff and Job Service staff at our tri-lingual call center were available to provide additional assistance to workers that requested it to ensure they were registered prior to completing the seasonal work. An alternate registration process was also available to assist those who had no access to computers and had other barriers that prevented them from completing the registration.

A hardcopy application is available in English and Spanish and efforts to include language access into the self-registration system are being considered for the future as JCW enhancements are planned. Additionally, an English, Hmong, and Spanish tri-lingual call center is available to address questions and provide services to customers who are not able to access web-based services or physically access the Job Center services.

Assessment of MSFW Needs

After self-registration, the Outreach Worker may also assess the needs of the MSFWs and provide the identified necessary services. Information from our WIA 167 grantee Farm workers needs assessment indicates that the top three needs are: Food, Housing and Health/Medical.

Referrals to Supportive Services

When applicable, Outreach Staff will make appropriate referrals to our WIA 167 partner (UMOS), Migrant Law Enforcement, Legal Action, La Clinica, and DOL's Wage & Hour Division, as well as to other community based organizations or supportive services agencies.

Other Tools Used To Conduct Outreach

- Outreach planning documents, based on estimates of the number of MSFWs needed during the projected session
- Joint outreach planned visits or events with MLE Inspectors, UMOS staff, High Equivalence Programs, Family Health/Clinica Mobile Unit or other MSFW Partners
- Printed pamphlets in English/Spanish are distributed to MSFWs and/or posted in gathering areas. The pamphlets provide information about services such as supportive services available to them, community-based organizations that can assist them, filing/use of the complaint system, the Wisconsin Migrant Labor Law, UI information, farmworker rights, and Federal Wage/Hour laws, etc.
- Trilingual JS call center
- JCW cards

Outreach Records

Staff report the provision of employer and migrant worker service on an ongoing basis. Results are routinely generated through Wisconsin's comprehensive Job Center of Wisconsin and ASSET system.

Staff report on services provided to meet any of the five equity of service indicators:

1. MSFWs referred to jobs
2. MSFWs that received staff-assisted services
3. MSFWs referred to supportive services
4. MSFWs provided career guidance and
5. MSFWs provided job development contacts.

All states are required to meet at least four of the five equity indicators.

Staff also report on services provided to meet any of the seven Minimum Service Level Indicators and Compliance Levels:

1. MSFWs placed in a job
2. MSFWs placed in a job with a wage exceeding the Federal minimum wage by at least 50 cents/hour
3. MSFWs placed long-term (150 days or more) in a non-agriculture job
4. Reviews of significant MSFW local offices
5. Field checks conducted on agricultural clearance orders
6. Outreach contacts per staff day (minimum of 5 contacts per staff day/8 hrs)
7. Timely processing of complaints

All significant MSFW states, including Wisconsin, are required to meet at least four of the seven minimum service level indicators.

Additionally, planning and other outreach activities are reported through SharePoint in the DET MSFW Collaborative Workspace.

WP Act Services Provided to MSFWs

- Registration for Wagner Peyser and other Job Center services
- Explanation and use of JCW job searches
- Counseling
- Referral to agricultural and non-agricultural job openings
- Job seeking skills
- Testing

- Assessment
- Referrals to other agencies
- Information on employment and training activities in area
- Labor market information
- Tax Credit Programs
- Language access
- Information on the Job Service complaint system, filing and processing complaints
- Bonding program assistance

Monitor Advocate Services

A permanent, full-time State Monitor Advocate is assigned by DWD to perform the following:

Monitoring Duties:

- Conduct agency-wide and on-going review of state-wide delivery of services and protections afforded to MSFWs.
- Coordinate efforts to assure that significant MSFW offices are reviewed at least once a year.
- Consult with state and local offices to ensure accurate reporting of MSFW-related information.
- Review proposed state Job Service directives, manuals and operating instructions relating to MSFWs.
- Participate in Federal monitoring reviews.
- Review and report on at least a quarterly basis, all agency statistical and other MSFW-related data reported.
- Responsible for all MSFW program reporting to the Region as required or requested.
- Prepare an annual summary report of statewide services to MSFWs for the Division Administrator.

Advocacy Duties:

- Oversee the operation and performance of the Job Service complaint system.
- Review the state agency's MSFW Outreach plan
- Review the outreach workers yearly outreach plan and monthly outreach summaries
- Serve as an advocate to improve services to MSFWs within Job Service

Field Duties:

- Conduct frequent field visits to the working and living areas of MSFWs to offer and verify Job Service services were provided
- Meet and work with community-based organizations and other employment-related agencies to coordinate other services to MSFWs
- Raise issues as appropriate to ensure that the development of new systems/strategies for service delivery include meeting the needs of MSFW customers

The Monitor Advocate also serves as a liaison to the U.S. Department of Labor to raise issues related to the need to revise program regulations to more effectively relate to the integrated provision of service delivery for MSFWs and to keep pace with developing technologies.

The monitoring reviews which are performed by the Monitor Advocate take place in the Job Centers and are further assurance that local systems are in compliance with the equity indicators and minimum service levels for MSFWs. The reviews also include labor exchange centralized activities such as job order processing, language access plans, etc. The reviews also include personal contact with MSFW families in their living areas to ascertain their satisfaction with service provided by the Outreach workers.

The Monitor Advocate will also provide training for partner agency staff on the National Monitor Advocate System, MSFW Outreach, and overall provision of services to MSFWs and the Job Service Complaint System.

The Monitor Advocate ensures coordination of DET services with the various internal and external MSFW partners. Within the agency, the Monitor Advocate participates in the DET Policy Coordination team along with the FLC Program Coordinator and managers from Bureau of Job Service and Migrant Labor Enforcement. This policy coordination team ensures coordination and policy alignment in state and federal regulations regarding DWD services to MSFWs.

Additionally, the Monitor Advocate provides staff support for the implementation of the DET non-financial Memorandum of Understanding with the WIA 167 partner, UMOS. The Monitor Advocate also attends and participates in Migrant Labor Council, Migrant Coalition and other meetings as expected of the State Monitor Advocate.

D. Services Provided to Agricultural Employers through the AJC Network

Agricultural employers receive all services provided to non-agricultural employers. (See WIA/WP Plan for services to employers.) Additionally, agricultural employers have access to the following WP Act Services or resources:

- Agricultural Recruitment System (Intrastate, and Interstate Clearance Orders)
The ARS is an extension of the basic labor exchange services. The purpose of the ARS is to meet the labor needs of agricultural employers, provide job opportunities to farm workers, and protect the domestic agricultural workforce. The ARS ensures proper disclosure of the terms and conditions of employment to seasonal workers who are recruited from outside of the local commuting area. Employers who wish to use the ARS system must submit a clearance order that complies with regulations at 20 CFR 653, Subpart F.
- Temporary FLC Programs
The DWD FLC Program performs all of the State Workforce Agency duties related to the H-2A (Agriculture) and H-2B (Non-agriculture) temporary labor certification programs. These programs allow employers to obtain visas for foreign workers if the employer demonstrates that there are not sufficient U.S. workers who are able, willing and qualified to perform the temporary labor or services and that the employment of foreign workers will not adversely affect the wages and working conditions of similarly employed U.S. workers.
- Wisconsin Migrant Labor Law
The MLE unit enforces the Wisconsin Migrant Labor Law on behalf of individuals who travel to Wisconsin for employment in agriculture, horticulture and food processing for less than ten months per year. The Wisconsin Migrant Labor Law provides standards for wages, hours and working conditions of migrant workers, certification, maintenance and inspection of migrant labor camps, recruitment and hiring of migrant workers and guarantees the right of free access to migrant camps. Additionally, the MLE unit provides technical assistance to covered employers to promote compliance. Technical assistance is provided to employers and crewleaders one on one, as needed to address specific compliance issues, and through specific group meetings and training.

E. Data Analysis

	PY 2013	PY 2014 (Based on Est. Data)
Agricultural Job Orders Received	283	325
Job Openings	1,327	1,625
Interstate Clearance Orders Received	13	18
Interstate Clearance Orders Initiated	13	18

F. Other Requirements

Assurances:

Statement of Approval of the State Monitor Advocate

In accordance with 20 CFR Subpart B, 653.107 and as prescribed by Region V, the Monitor Advocate participated in the preparation of the agricultural plan and has been afforded the opportunity to approve and comment on the plan. Such review indicates that the plan has been prepared properly, omitting none of the prescribed requirements and properly describing the activities planned for providing services to both agricultural employers and migrant and seasonal farmworkers.

All recommendations were included as the State Monitor Advocate presented them in the annual MSFW summary developed under 20CFR 653.108(t) in the preparation of this plan. The Bureau of Job Service has given consideration to the previous year's Annual Monitor Advocate Report and offers the following for consideration. The Bureau of Job Service will continue to analyze and evaluate the impact of information technology and new delivery systems and will continue to work with the Regional Office to resolve these issues.

Significant Office Requirements

The Employment and Training Administration has designated Wisconsin as a significant state. As such, the two significant offices have a full-time staff bilingual staff assigned to MSFW activities during the season or as needed off season. The state assures that MSFW significant office requirements are met. The State Monitor Advocate is a bilingual staff that is dedicated full-time and all year around to MSFW activities.

Review and Public Comment

In accordance with 20 CFR Subpart B, 653.107(d)(1), (2), and (3), DWD/Job Service has solicited information and suggestions from UMOS, WIA Section 167 grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations to comment on the State Agricultural Services Plan.

At least 45 days before submitting its final outreach, the State provided a proposed plan to the organizations listed above and allowed at least 30 days for review and comment. The State considered any comments received in formulating its final proposed plan, informed all commenting parties in writing whether their comments have been incorporated and if not, the reasons therefore, and included the comments and recommendations received and its responses with the submission of the plan. Any comments received after the submission date will be forwarded to the region, under separate cover.