



KENTUCKY WORKFORCE INVESTMENT BOARD

September 17, 2009

The Honorable Hilda Solis, Secretary of Labor  
U.S. Department of Labor  
200 Constitution Ave., NW  
Washington, DC 20210

RE: RIN 1205-AB56

Dear Secretary Solis:

At the September meeting of the Kentucky Workforce Investment Board, consideration was given to proposed rule change identified above. Based on input from the Commonwealth's workforce agency, a letter received from the coalition of local WIB directors, and the positions adopted by several local workforce investment boards, members of the KWIB discussed the proposed change and voted unanimously to support the position of the local workforce boards and to submit this letter as a public comment.

The position endorsed by the KWIB is one of opposition to the rule change as proposed. Kentuckians have benefited from significant improvements in the delivery of TAA services since the program has been decentralized and integrated with the delivery of WIA services. While sensitive to the fact that TAA benefits are an entitlement program, it is the position of this board that those services, as delivered under the current, locally administered system rather than the former, centralized system provide a higher level of service to the people of Kentucky.

We understand that what might be right for Kentucky may not be right for other states. Therefore, the KWIB supports the idea that each governor should have the opportunity to determine the system which offers the highest quality, most efficient and accountable, non-duplicative, and integrated delivery of services in his or her state.

Thank you for considering our position,

A handwritten signature in blue ink, appearing to read 'Ed Holmes', is written over a light blue rectangular background.

Ed Holmes  
Chair, Kentucky Workforce Investment Board

Education & Workforce Development Cabinet  
500 Mero Street, 3<sup>rd</sup> Floor  
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