



January 22, 2025

The Honorable Chrissy Houlahan
1727 Longworth House Office Bldg
Washington, DC 20515

The Honorable Stephanie Bice
2402 Rayburn House Office Bldg
Washington, DC 20515

Representative Houlahan and Representative Bice:

The National Association of State Workforce Agencies (NASWA) is grateful to the House Bipartisan Working Group on Paid Leave for the opportunity to comment on the discussion draft for the Interstate Paid Leave Action Network Act (I-PLAN Act).

NASWA is the national organization representing all 50 state workforce agencies, D.C. and U.S. territories. NASWA provides policy expertise, shares promising state practices and promotes state innovation and leadership in workforce development. Our mission is to enhance the state workforce agencies' ability to accomplish their goals, statutory roles and responsibilities.

Through our national policy committees and workgroups, NASWA members inform policy makers about issues that are critical to state workforce agencies. These groups are active throughout the year and meet regularly to collaborate on key issues across the national workforce system.

NASWA has been supportive of the work of the Bipartisan Working Group's efforts and the development of the I-PLAN Act. Our members requested the establishment of the Paid Family and Medical Leave (PFML) Workgroup due to the need for increased communication and discussion among states.

NASWA's PFML Workgroup members are paid leave program administrators or designees and workforce agency leaders in states without paid leave who have a vested interest in understanding paid leave programs. The NASWA PFML Workgroup strives to address concerns pressing to the states and territories, share best practices, and communicate with external partners and stakeholders.

The PFML Workgroup meets virtually each month and in-person once a year. In 2024, the group held its first in-person convening in New Orleans which allowed the members to propel their mission and goals forward.

The shared goals of the workgroup include:

- Support fellow states and territories as they explore, pass, implement, and improve paid family and medical leave programs
- Provide advice, receive updates, and inform the work of federal policymakers and other key external stakeholders, including but not limited to researchers, advocates, vendors, and others.
- Assist with the development of NASWA's legislative and other priorities
- Coordinate to provide responses and feedback to issues affecting paid leave programs
- Strive to address fraud detection, prevention, and bring awareness to the latest fraud trends impacting paid leave programs
- Develop resources to address the needs and interests of the Workgroup. This could include but is not limited to a state comparison tool, a Frequently Asked Questions repository, and the creation of shared definitions.

We are pleased the I-PLAN Act requires the establishment of an Intermediary to facilitate the Interstate Network. This would include but not be limited to hosting meetings, publishing information and updates, engaging with external stakeholders, and creating or leveraging a standardized technology-based system allowing states to achieve the goals of the I-PLAN Act agreement by processing interstate claims and strengthen program integrity. These goals are critical next steps in addressing the needs of state paid leave programs. NASWA has an interest in fulfilling this role if the legislation is passed.

We look forward to facilitating more discussion on the legislative draft and continuing to partner with the Bipartisan Working Group on their legislative efforts related to paid leave.

Sincerely,



Joseph M. Barela
NASWA Board Chair
Executive Director, Colorado Department
of Labor and Employment



Scott B. Sanders
President and CEO
NASWA