



**To: Chicago Cook Workforce Partnership,
From: Chicago Jobs Council**

Re: Comments on 2020 Local Workforce Innovation and Opportunity Act (WIOA) Plan

March 16, 2020

The Chicago Jobs Council appreciates the opportunity to both provide input in the development of the local WIOA plan and to provide comments on the posted plan. We note that a lot has been accomplished over the period of time since the last plan, that a number of things have changed in the workforce and job training landscape, and that The Partnership has been responsive to changing conditions. Although there is a lot more in this plan than we comment on, we have limited our comments to issues related to the most disconnected job seekers--those with barriers to employment and those who have been left out of the economic recovery (which is likely over as we write these comments!). In part, we draw on what we have learned through our work to improve access to quality workforce services for people who show up in safety net systems, including the SNAP program and Chicago's homeless-response system.

At a very high level we want to recognize that The Partnership did a significant amount of public engagement during the development of the plan and we recommend that there is an exploration of how to continue to use those strategies to keep stakeholders engaged during the life of the plan. The Partnership's position at the center of the region's ecosystem of workforce, education and economic development means that it has a unique perspective; it is positioned, with stakeholders (not only it's WIOA "partners"), to identify the most critical workforce challenges, demands and gaps and then develop strategies, regardless of whether WIOA is the answer. Once there is high level identification of challenges and strategies, it can then be determined what The Partnership's role is and then what the role of WIOA is in addressing those issues. We know that this plan is framed by the federal law and the state's guidance, so it is not designed to do that. But, it would be a missed opportunity if we didn't leverage the stakeholder engagement process that The Partnership started in this planning period for the purpose of continuing to build a responsive workforce development system in the region. Of course, the Jobs Council would be interested in supporting The Partnership in doing that.

What follows are some comments, questions and recommendations in four different topic areas.

Opportunities to break down siloed services: One of the things that the Jobs Council is concerned about is the extent to which funding rules have the (probably unintended) impact of silo'ing services and strategies. Instead of making funding requirements and policies something that administrators bear the responsibility for, they become the characteristics of program design. We want to note that issue in our comments to this plan because we think it should be an aspiration of the region's workforce system to make funding requirements and policies invisible to the customer (both employers and job seekers). We don't think that policy language is intended to be the description of strategy or program design.

For example, a best practice in workforce development is braiding or integrating funding, but that has been noted as difficult by many providers, including smaller organizations. In addition, they note that administering WIOA is more burdensome than other funding streams and that the amount of administration takes staff time away from providing services. It would be great to see in this plan any actions that The Partnership is going to take to incent or help with braiding of funding if that is one of the strategies to improve access to job seekers with barriers. In the summary of our provider survey findings we noted that "Organizations are utilizing this [non-WIOA] funding to cover the full staffing needs of programs or to cover disallowed costs. Respondents would like additional clarity on what blending of funding sources are allowed and would benefit from best practice training on finance department operation." We recently hosted a meeting with five community-based workforce organizations to discuss their approaches to job readiness services. Most of them described approaches to job readiness that differed depending on a program's funding stream. We don't mean to imply that The Partnership or WIOA is solely responsible for this, but we are concerned that for some organizations program design is limited by funding requirements.

We know that to some extent "service integration" is intended to reduce silos within the WIOA programs and we know that, in this plan, "service integration" is a term-of-art that refers only to WIOA services and titles. That said, the need to better integrate services is equally important between WIOA and related non-WIOA services. From our perspective, for the people who are the most disconnected from the mainstream labor market, the other service systems are: Chicago Department of Family and Support Services-funded workforce services, homeless services, the SNAP program, and the many approaches to providing support services. We would recommend that The Partnership prioritize the work that it is already involved in related to this--in particular the Employment Task Force of the Chicago Continuum of Care (we did not see this work mentioned anywhere in the plan). Another idea worth considering is designating a subgroup of the Service Delivery Committee or creating another time-limited work group to explore the alignment, integration issues faced by WIOA delegates when working with services that they provide that are funded from other systems or sources.

Access to workforce services and employment: One of the things we know from data matches between SNAP and WIOA and between HMIS and WIOA is that very few people in those systems are using the WIOA system despite, in some cases, work requirements and, in most cases, strong motivation to work. On page 5 of the plan in the section that outlines how the

Local Board will facilitate access to services through the use of technology or other means, the plan outlines five different technology-based systems that are customer-facing. The existence of five different on-line entry points only highlights how confusing it could be as a job seeker trying to find services. Also there's nothing about access to services other than technology. We know, for example, that during a two year period in 2017-2018 fewer than 1% of individuals coming through the homeless response system got WIOA services. Those individuals might not have the consistent ability to use technology and we wonder what might be the operating systems or policies that would result in more people getting into American Job Centers or to delegate agencies.

In the section about "expanding access to employment, training, education and supportive services for eligible individuals, particularly individuals with barriers to employment" on p. 6-7 we are impressed by the strong connection to all of the important City and County efforts to reinvest in parts of the region that need it the most and have been impacted by decades of racist public policies. The Partnership is a critical player in those efforts. All of the strategies outlined in this section are important, but it was hard for us to make the connection to improving access for the job seekers with barriers to employment. For example, as the Partnership is involved with Apprenticeship projects (noted on p. 7), we are wondering what the specific activities of the Partnership are that will make sure that Apprenticeships are accessible to people who have more barriers and/or to people of color and women who have traditionally been left behind. Similarly, we wonder what role WIOA funding, WIOA-funded services, and/or WIOA delegates is in these efforts.

Services on the Career Pathways Continuum: A couple of sections of the plan provides information on The Partnership's work related to career pathways, including career pathways being one of the strategies used to increase access for those with barriers to employment (pp. 8-9). This section outlined several great projects, but it wasn't clear how any of them will have a long-term, systems-level impact on access to career pathways for individuals who experience barriers. In another section of the plan on pp. 17-18 we wondered how the work in this area is connected to or reflects the state's definition of career pathways. In the section related to programs of study and career pathways (pp. 23-24) we did not see reference to how adults with low literacy, low educational attainment or other barriers can get access to these programs. While the predominant focus is on young people, we know that high percentages of community college students are adults. We also know from the report by Inspiration Corporation¹ that many adults experiencing homelessness have work experience, skills and educational attainment, but they are not getting to WIOA services. It seems that these career pathways strategies could make a huge difference for them, but access is the issue.

We continue to be disappointed that The Partnership chooses not to look at the Transitional Jobs (TJ) model as a strategy to give job seekers with barriers an opportunity to get work experience, skills and onto a career pathway. We understand that it is a more expensive

¹ <http://www.inspirationcorp.org/research-pages-161.php>

intervention than others. At the same time, it is a strategy that aligns with the state's guidance to improve access to those with barriers to employment and to expand the use of work-based learning strategies. At a time when the economy is strong, but many job seekers still struggle to get and keep jobs, we think that public funding should focus on those job seekers and the strategies that are designed for their needs. We also noticed that the plan's response related to work-based learning (p. 56) leaned more into meeting the needs of employers. TJ is a dual customer approach that, in its most effective use, balances the needs of both with the flexibility to adapt. Also, on p. 56 there's specific direction to use work-based learning and to include "goals for specific work-based learning activities and proposed outcomes" but this section doesn't have any activities or proposed outcomes in the response.

We do know that there is inflexibility in how public WIOA funding is used and that private funding creates an opportunity to try new things and be more flexible, but we do not see The Partnership's use of private funding as a way to fill basic gaps that exist in WIOA services. For example being able to serve job seekers who need more time -- using private funding to provide delegates the time to work with those job seekers before they "register" them in WIOA. We think that using private funds in this way could mitigate the existing disincentive in WIOA to serve those job seekers who have the most barriers.

We also have not heard how the non-WIOA investment then leads to learning and change in services in The Partnership's system. We know that it does, but it would be great if the change was communicated somewhere--in this plan, in the WIB and its committees, or in some public information dissemination. For example, Opportunity Works is a great model of blending funds and combining paid work with skill building, but it is not a scaled program yet. It would be great to understand how this strategy is going to be expanded and used across the system.

Supportive Services: We wondered if there are lessons or data from how WIOA funding has been used for support services. Questions we would ask include: is there a per person average of support services? Has that changed over the years? What is the range of uses for supportive services? What has The Partnership learned about barriers to uptake of supportive services? Part of the reason that we need to look more closely is the our survey of providers revealed that "Respondents reported having access to funding for support services and 88% utilize WIOA funding for supportive services; however, for all of these needs, more than 50% of respondents reported that they are not adequately covered by current WIOA funding." That is a big supportive services gap even when WIOA appears to be an effective tool. We have anecdotal information that the range of support services needs is wide and some of the needs can be experienced as insurmountable by job seekers and then contributes to their drop out from the labor market. We also wonder if being more connected to other systems--like SNAP or the homeless response system--would help to fill more support services gaps.