



The Chicago Cook Workforce Partnership’s Response to Public Comments Received on the 2020 WIOA Local Plan

The Partnership received four public comments from the following local stakeholders: The Cook County Bureau of Economic Development (CCBED), Chicago Jobs Council, Skills for Chicagoland’s Future, and The Employment Task Force of The Chicago Continuum of Care. The Partnership would like to thank all four stakeholders for their engagement in this process and for submitting such thoughtful comments on the WIOA Local Plan. In response, The Partnership made changes to the WIOA Local Plan in Chapter 5 Section B to add the strategies now under consideration as a result of these comments.

All four public comments in full are available on The Partnership website. Below is a summary of the comments and The Partnership’s response to each one:

Cook County Bureau of Economic Development

COMMENT

1. Commit to striving for greater parity of facilities and services between the City of Chicago and suburban Cook County.

RESPONSE

The Partnership weighs many factors when determining the appropriate geographic location of its facilities including which communities have the greatest need for services, the demographic and socioeconomic characteristics of communities throughout LWIA 7 and achieving an optimal level of services for both suburban Cook County and the City of Chicago. Currently, there are five



American Job Centers in suburban Cook County and five within the City of Chicago. During each RFP process, we will continue to take equitable geographic distribution concerns into account.

With respect to the specific programs raised in this comment, Chicago Codes was both funded and envisioned by the City of Chicago. With additional funding from Cook County, or other funders, The Partnership would eagerly expand the Chicago Codes program. With respect to Career Launch, we understand Cook County Bureau of Economic Development (CCBED) to be referring to the new apprenticeship program launched by Chicago Public Schools and City Colleges of Chicago. The Partnership is a partner in these efforts but does not lead or administer this program. The Partnership does, however, offer the Opportunity Works program exclusively to youth in suburban Cook County and has served nearly 1000 participants in the last three years.

COMMENT

2. Consider Cook County's "Priority Communities" (Health Communities, Open Communities, Sustainable Communities, Safe and Thriving Communities, Vital Communities, and Smart Communities) as prioritized for strategic implementation.

RESPONSE

The Partnership is deeply involved with all aspects of the Cook County Bureau of Economic Development's (CCBED) community-based plans, in particular its efforts in South Suburban Cook County inclusive of the County's development of its Policy Road Map. The Partnership has and will continue to support the County's Priority Communities in all ways and strives to align its policies and practices with the County's mission, vision and values.



COMMENT

3. Re-establish Manufacturing Sector Center(s) to focus on the employment needs of manufacturers.

RESPONSE

Manufacturing is one of The Partnership's seven priority high growth/high demand sectors. The Partnership invests over \$2.2 million annually in support of workforce development efforts in the manufacturing sector. The Partnership spent \$1,175,000 on career pathways programs through several Delegate Agencies in manufacturing in the last program year. Delegate Agencies like the Jane Adams Resource Corporation (JARC) offer several programs in manufacturing including Computer Numerical Control (CNC) and welding. The Greater West Town Development Program offers youth an alternative high school education experience with access to manufacturing and TDL training and career exploration.

Over the past four program years The Partnership has quadrupled its spending in manufacturing incumbent worker training from \$100,000 annually to \$400,000 annually in the last program year. In the last program year, The Partnership spent over \$375,000 towards Individual Training Accounts (ITAs) in manufacturing and over \$340,000 on On the Job Training in the manufacturing sector last year.

The Partnership's Business Services and Economic Relations (BRED) team is focused on meeting the needs of employers in the manufacturing sector. Members of the BRED team participate with



Cook County in the Calumet Manufacturing Industry Sector Partnership (CMISP) - an employer led partnership designed to increase competitiveness of the manufacturing sector.

The Partnership recognizes how vital the manufacturing sector is to our local economy and will continue to invest heavily in this sector regardless of whether there is a manufacturing sector center. Through our Sector Center RFP process, agencies will be able to identify the industry in which they would like to focus. Based upon stated capacity as well as funding, it is always possible that an agency could propose to support a Manufacturing sector center.

In response to this comment, The Partnership added that it would evaluate “the need for a new Sector Center in sectors beyond the three current Sector Centers in IT, Retail and Hospitality, and Healthcare” on page 65 of the final version of the WIOA Local Plan.

COMMENT

4. Expand pro-active lay-off aversion strategies.

RESPONSE

The Partnership pursues Incumbent Worker Training (IWT) agreements as proactive layoff aversion strategies. In the most recent program year 3% of training dollars were spent on IWT. To increase this spending The Partnership would need more IWT funding and greater leeway from the State. In the wake of the current COVID-19 crisis and recovery efforts, The Partnership will need to employ new layoff aversion strategies for engaging employers.



COMMENT

5. Deeper collaboration with Cook County regarding employer driven, sector based and community supported partnerships to increase the competitiveness of a sector such as manufacturing.

RESPONSE

The Partnership participates with Cook County in the Calumet Manufacturing Industry Sector Partnership (CMISP) - an employer led partnership designed to increase competitiveness of the manufacturing sector. The Partnership also signed a Memorandum of Understanding with the Cook County Bureau of Economic Development supporting their Apprenticeship Navigator Grant Application to the Illinois of Department of Commerce and Economic Development. Under the MOU The Partnership will support Cook County in their Navigator role to expand apprenticeships in manufacturing and other sectors.

In response to this comment, The Partnership added that it would evaluate “ways to deepen collaboration between The Partnership and its partners, like Cook County, around employer driven, sector-based partnerships to increase competitiveness of a sector, including manufacturing” on page 65 of the final version of the WIOA Local Plan.

COMMENT

6. Develop and share mutually beneficial tools like TPM (Talent Pipeline Management) and approaches to sharing tax relief entities.



RESPONSE

In response to this comment, The Partnership added that it would evaluate the “feasibility of developing and investing in mutually beneficial tools with Cook County and other partners including TPM (Talent Pipeline Management)” on page 65 of the final version of the WIOA Local Plan.

COMMENT

7. Collaborate and leverage resources to provide common platforms to engage employers.

RESPONSE

In response to this comment, The Partnership added that it would evaluate “[w]ays to collaborate and leverage resources to provide common platforms for The Partnership, Cook County, and other partners to engage employers” on page 65 of the final version of the WIOA Local Plan.”

COMMENT

8. Adopt a forward-looking approach to skills training and credentials.

RESPONSE

The Partnership’s programmatic and data focus reflect both prospective and retrospective planning and analysis. For example, our Where are the Jobs reports look back at the prior quarter’s labor market to illustrate the skills, credentials and occupations that employers sought in that period.



Similarly, our analysis of labor market data and projections about future needs informs our certification of training programs. On balance our responsibility is to stay ahead of the market, project future needs and craft programs to address these needs in order to avoid a dearth of skilled labor.

We agree that competency-based hiring is both sound and advantageous. Nonetheless, credential attainment is often reflective of experience and indicative of technical competence. There is a delicate balance to be struck between the two. Further, the Workforce Innovation and Opportunity Act (WIOA) requires that funding be aligned with credential- yielding programs.

Chicago Jobs Council

COMMENT

Opportunities to break down siloed services:

1. Incentivize or help agencies to blend and braid funding and offer more guidance around what blending of funding sources is allowed; and

RESPONSE

In response to this comment, The Partnership added the following to the plan: we will evaluate “[w]ays to collaborate with partners like the Chicago Jobs Council to provide training and clarity for Delegate Agencies on allowable braiding and blending of funding sources” on page 65 of the final version of the WIOA Local Plan.



COMMENT

2. Include non-WIOA services in the Service Integration Plan and create a working group addressing delegate agencies integration with services from other systems.

RESPONSE

Under the Workforce Innovation and Opportunity Act (WIOA) The Partnership is required to prioritize service integration between the WIOA mandated partners. The Partnership does, however, strive to integrate non-WIOA services wherever possible. The Department of Family and Support Services (DFSS) sits on both the Service Delivery and Youth Committees of the Chicago Cook Workforce Innovation Board. The Partnership's CEO also serves on the City's Education and Human Services Cabinet alongside the DFSS Commissioner. The Partnership actively collaborates with a host of other service delivery departments and agencies that are not within the WIOA system, including The Mayor's Office for People with Disabilities, Chicago CRED, Heartland Alliance. The Partnership will gladly collaborate with other organizations to ensure fulsome service delivery. We endeavor to incorporate these organizations, and their recommendations into our practices.

In response to this comment, The Partnership added that it would evaluate "[c]urrent service integration strategies that can be expanded beyond WIOA Core Partners and MOU partners like DFSS to include other organizations also serving jobseekers such as organizations specialized in serving harder to serve populations like individuals experiencing homelessness" on page 65 of final version of the WIOA Local Plan.



COMMENT

Access to workforce services and employment:

1. On page 5 of the WIOA Local Plan, The Partnership lists five different customer facing technology systems. Five different systems could be confusing to jobseekers, especially those without consistent access to the internet and technology.

RESPONSE

These five systems were listed in response to a specific question in in the WIOA Local Plan about facilitating access to services through technology in remote areas. These systems are operated by the various departments of the State of Illinois and are available to all jobseekers throughout the state. As explained on pages 3 and 4 of the WIOA Local Plan, The Partnership developed its own data system, Career Connect, precisely to reduce confusion and silos in workforce service provision. Career Connect was designed to serve as the sole interface for jobseekers and employers in our region so that customers need not navigate the many statewide systems.

COMMENT

2. How will The Partnership ensure that all its programs, for example Apprenticeship programs, are accessible to individuals with barriers to employment?

RESPONSE

The Partnership leads an ongoing process with all core partners to evaluate all partners' eligibility and referral processes as part of our service integration work. The partners have developed a strong



integrated service delivery plan to ensure all jobseekers, regardless of their barriers to employment, are provided with services or an appropriate referral. The overwhelming majority of the clients served have at least one and, in many cases, multiple barriers to employment. The Partnership is focused on continuing improvement and innovation within our system. In early 2020, the Chicago Cook Workforce Innovation Board voted to activate a Disability & Inclusion Committee of the Board. This Committee will begin leading efforts to improve services to people with disabilities in 2020.

COMMENT

Services on the Career Pathways Continuum:

1. How will The Partnership's current programs outlined in the WIOA Local Plan improve access to career pathways for individuals who experience barriers?

RESPONSE

In the WIOA Local Plan on pages 8 and 9, The Partnership outlined several programs designed to serve individuals experiencing specific barriers to employment. The Partnership's Opportunity Works program improves access to career pathways for young adults experiencing barriers to employment by recruiting youth with multiple barriers into an initial tier of services or on-ramp. Youth with multiple barriers are exposed to careers in high growth sectors and often obtain the first stackable credential needed to gain entry to the many occupations within that sector. This type of structured career exploration is critical to preparing individuals for future success.



The Partnership also improves access to career pathways by reconnecting youth with barriers to education through employment. Program designs feature linkages to public schools, credit recovery programs, options schools (non-traditional schools), and other systems for attaining a secondary credential. This model also features a strong academic remediation curriculum to ensure skills gains in reading and math, as well as preparing young people to re-enter an academic setting. Programs offer supportive services such as transportation, work attire, and connections to other social services such as housing or court advocacy. The Partnership currently funds five programs at four providers that implement this model including the following:

- The Greater West Town Development Program offers youth an alternative high school education experience with access to manufacturing and TDL training and career exploration.
- Alternative Schools Network provides career coaching to students who have dropped out or been expelled from traditional high schools while reconnecting them to secondary education through a network of alternative or options high schools.
- Central States SER provides onsite GED classes and tutoring combined with career coaching at two locations including one inside of an Illinois Department of Juvenile Justice facility. This provider has developed a service model that is very effective engaging gang involved youth and connecting them to education and employment opportunities.

The majority of WIOA participants The Partnership serves experience at least one barrier to employment. The Partnership, representing Title I of WIOA, is one piece of the larger network of education and workforce providers that facilitate career pathway programming. The Partnership consistently seeks ways to collaborate with our partners around improving access to career pathways.



COMMENT

2. How will adults with low literacy and low educational attainment access career pathway programs?

RESPONSE

The Partnership works closely with the other titles under the Workforce Innovation and Opportunity Act (WIOA) to meet the needs of jobseekers requiring additional supports and education. Innovative Title II coordination has been successfully demonstrated in an award-winning pilot project in the Near West American Job Center, located in Chicago's Pilsen community. The Chicago Citywide Literacy Coalition created a Title II Navigator, a model that resulted in increased efficiency and streamlined provision of adult education services within the community of Adult Basic Education providers that are members of the Title II Area Planning Council, as well as solutions for tracking and referral of participants that benefit all of the organizations serving the community. The model gained national recognition with a 2020 award from National Skills Coalition. This model helps individuals with low literacy and low educational attainment access the training and education need to prepare them for success when returning to access Title I workforce programs.

COMMENT

3. Consider using Transitional Jobs to balance the needs of jobseekers and employers rather than focusing so heavily on the needs of employers when it comes to work based learning opportunities.



RESPONSE

In response to this and a subsequent comment, The Partnership added that it would evaluate “[l]ocal needs for transitional jobs programs and an explore potential alternative sources of funding available to operate transitional jobs programs” to page 65 of the final version of the WIOA Local Plan.

The Partnership agrees that Transitional Jobs can be an effective model for meeting the needs of certain jobseekers. When The Partnership was first formed the City of Chicago determined that its Department of Family and Support Services (DFSS) should continue to provide Transitional Jobs programs with Community Services Block Grant (CSBG) funding and The Partnership should focus WIOA funds towards other work-based learning models.

COMMENT

4. The Partnership should offer goals for specific work-based learning activities as well as proposed outcomes.

RESPONSE

In the WIOA Local Plan, The Partnership proposes to “conduct a thorough analysis of training data across models, including enrollment and outcomes, alongside labor market information and best practices from other LWIAs. Based on the findings, The Partnership will set ambitious targets around the number or percent increases in OJT and IWT and will identify and strategically engage employers in order to facilitate this shift” (p. 60, final version of the WIOA Local Plan). The



Partnership will share these targets and proposed outcomes with the Chicago Cook Workforce Innovation Board when they are available.

COMMENT

5. The Partnership should use private funding and non-WIOA investments to fill in gaps that exist in WIOA services. For example, offering private funding to delegate agencies to work with jobseekers who need more attention and assistance before registering in WIOA.

RESPONSE

The vast majority of private philanthropic funding is tied to a particular purpose or objective aligned with the mission, vision and wishes of the granting foundation or corporation. The Partnership receives a comparatively limited amount of these dollars, but they are overwhelmingly tied to specific initiatives. Available funding for unrestricted general operating funds that would allow the type of flexibility contemplated by the comment is scarce. The Partnership consistently seeks out, and will continue to pursue, grants that would allow greater flexibility to increase support to agencies and fill in gaps in WIOA services.



COMMENT

Supportive Services:

1. What lessons can be learned through data collected on how WIOA funding has been used for support services including the per person average cost, trends over the years, and how do barriers relate to the uptake of supportive services?

RESPONSE

In response to this comment, The Partnership added that it would evaluate “[i]nternal data collected on WIOA funds used towards supportive services as well as evaluation of opportunities to share this data analysis” to the final version of the WIOA Local Plan (WIOA Local Plan, p. 65).

COMMENT

2. Would being connected to other systems like SNAP or homeless response system help fill more support services gaps?

RESPONSE

In many states across the country, programs such as SNAP, TANF, Headstart are centralized under one state agency and are also managed by local workforce boards. This is not Illinois’ structure. The Illinois Department of Human Services, which administers TANF and SNAP, is a federally-mandated core partner and a signatory to the LWIA 7 Memorandum of Understanding. The Partnership will gladly collaborate with CJC and other partners to better understand how we can connect with the homeless response system among other stakeholders.



Chicago Continuum of Care Employment Task Force

COMMENT

Conduct a Public Comment Process:

1. Inclusive stakeholder engagement process to collect meaningful input on priority populations and service strategies, build consensus on actionable strategies, and collect input on implementation methods;

RESPONSE

The Chicago Cook Workforce Partnership posted the proposed WIOA Local Plan on The Partnership's website on February 14, 2020, with instructions to submit public comment by email to localplan2020@chicookworks.org. Comments were accepted at this email address through 5:00 PM on March 16, 2020.

To encourage public comment, The Partnership promoted the Local Plan public comment period through in person contact, social media, and email throughout its network of businesses, education institutions, labor organizations, government agencies, elected officials, policy organizations, foundations, and service providers. Additionally, The Partnership published the following notice in the Chicago Sun-Times on February 12, 2020 and in the Chicago Tribune on February 13, 2020 to invite members of the public to comment on our proposed 2020 local plan:

“Chicago/Cook County Workforce Innovation and Opportunity Act 2020-2024 Local Plan is posted for public comment on 2/14/2020 at www.chicookworks.org.”



During and after the public comment period, The Partnership reviewed all submitted comments and considered them in relation to the overall strategy of the Chicago Cook WIB. Comments that aligned with or enhanced organizational strategy were incorporated into the body of the WIOA Local Plan.

Additionally, The Partnership enacted a series of activities to engage stakeholders in the development of the Local Plan before the public comment period. Beginning in October 2019, staff from The Partnership conducted the following action steps to ensure that a diversity of opinions, strategies, and expertise were consulted during the development of the Local Plan:

- Literature review of policy documents, data sets, reports, surveys, analysis of promising practices, position statements and other existing documents that have bearing on workforce development policy
- Focus groups with Chicago Cook Workforce Innovation Board committees, delegate agencies and AJC Title 1 providers, individuals with lived experiences from target populations, business service staff, and the Chicago Workforce Funders Alliance
- Briefings with the Chicago Cook WIB, WIOA-mandated partners, and policy leadership staff from the offices of the Mayor of Chicago and the President of Cook County
- Individual conversations with thought leaders and subject matter experts
- Online surveys of businesses, jobs seekers, and required partners
- Anonymized survey of service contractors of The Partnership
- Strategic planning retreat with the Chicago Cook WIB



Information and perspective gained during the stakeholder engagement process considered the viewpoints of businesses, organized labor, educational institutions, job seekers, foundations, policy organizations, and elected officials; and informed the development of the WIOA Local Plan. Individuals who participated in stakeholder engagement were also invited to submit public comments during the 30-day period.

COMMENT

2. Report results of stakeholder engagement to WIB and DCEO;

RESPONSE

In January 2020, The Chicago Cook Workforce Innovation Board convened for a strategic board retreat where Partnership staff shared the results of local stakeholder engagement. Board members provided input on proposed strategies and outcomes to be included in the WIOA Local Plan.

COMMENT

3. Consider and commit to service delivery changes based on stakeholder feedback; and

RESPONSE

All service delivery changes must be in alignment with City and County administrative direction and guidance, while ensuring compliance with State and Federal rules, regulations, and policies. That said, The Partnership added several strategies we would consider that were recommended during the public comment period to the final version of the WIOA Local Plan in Chapter 5, Section B, page 65.



COMMENT

4. Modify local plan in accordance with changes.

RESPONSE

In response to the four public comments submitted, The Partnership added several strategies to the final version of the WIOA Local Plan in Chapter 5, Section B, page 65.

COMMENT

Investing in services and strategies appropriate for homeless job seekers, including:

1. Pilot an “employment navigator” to increase access to employment and training services for individuals experiencing homelessness;

RESPONSE

In response to this comment, The Partnership added that we would evaluate the “[f]easibility and value of piloting an “employment navigator” to increase access to employment and training services for individuals experiencing homelessness” on page 65 of the final version of the WIOA Local Plan.

COMMENT

2. Invest WIOA funds in transitional jobs to help homeless job seekers successfully reconnect to the labor market;



RESPONSE

In response to this and an earlier comment, The Partnership added that it would evaluate “[l]ocal needs for transitional jobs programs and an explore potential alternative sources of funding available to operate transitional jobs programs” to page 65 of the final version of the WIOA Local Plan.

The Partnership agrees that Transitional Jobs can be an effective model for meeting the needs of certain jobseekers. When The Partnership was first formed the City of Chicago determined that its Department of Family and Support Services (DFSS) should continue to provide Transitional Jobs programs with Community Services Block Grant (CSBG) funding and The Partnership should focus WIOA funds towards other work-based learning models.

COMMENT

3. Leverage existing digital access and digital literacy initiatives to expand access to services for homeless job seekers;

RESPONSE

The Partnership does provide digital literacy training at the American Job Centers and many delegate agencies. In response to this comment, The Partnership added that we would evaluate “[w]ays to further leverage ongoing digital literacy efforts to expand access to jobseekers experiencing homelessness” to page 65 of the final version of the WIOA Local Plan.



COMMENT

4. Expand the capacity of existing financial capability programming by The Partnership's delegate agencies to serve homeless job seekers;

RESPONSE

The Partnership welcomes the Chicago Continuum of Care Employment Task Force's assistance with capacity building efforts around financial capability programming to better serve homeless jobseekers. The Partnership is willing to collaborate on these efforts.

COMMENT

5. Implement training across The Partnership's delegate agencies on employment rights, including the rights of economically vulnerable job seekers such as homeless individuals; and

RESPONSE

Same as above. The Partnership welcomes assistance from the Chicago Continuum of Care Employment Task force to facilitate this kind of training for our delegate agencies.

COMMENT

6. Adopt a "no time limit" and "zero exclusion" approach to serving homeless job seekers that increases flexibility and exercises discretion on performance, comprising service strategies such as:



- a) Supporting multiple attempts at jobs or job training;
- b) Increased flexibility on service length and gaps between service;
- c) Tracking persistence through other evidence beyond existing metrics; and
- d) Expanded recognition of employment success to include part-time employment, contract employment, and other means of earning and increasing income.

RESPONSE

The Partnership does not have the authority to implement these suggestions absent changes to the Workforce Innovation and Opportunity Act (WIOA) rules which would have to happen at a federal level or through State guidance. There is a federally prescribed time limit - both to WIOA funds and period of performance.

Skills for Chicagoland's Future

COMMENT

1. Skills emphasized the importance of a Business Intermediary, such as Skills, as supporting The State of Illinois Vision Statement as the Business Intermediary has a business-driven mandate to provide linkages between employer's needs and connect these opportunities to the many nonprofit organizations in the workforce system;

RESPONSE

The Partnership supports the State of Illinois Vision Statement and provides effective employer focused solutions throughout our region. At our core, we serve two clients—business and job



seekers. Toward that end, The Partnership's Business Relations and Economic Development team functions as a business intermediary in that it is focused exclusively on meeting the needs of employers in our region's highest growth sectors while serving as a bridge to the more than 50 community-based organizations serving as delegate agencies within the public workforce system. The Business Relations team not only provides access to skilled talent, but also directly builds capacity among the delegate agencies by providing monthly sector-driven meetings, trainings and oversight of on-the-job, customized and incumbent worker training initiatives. This team provides regular market data and information on industry trends and employer practices. Additionally, The Partnership's three Sector Centers in Information Technology, Health Care, and Retail and Hospitality allow us to create stronger links between employers and our network of American Job Centers and Delegate Agencies.

COMMENT

2. Having a Business Intermediary, such as Skills, supports expanded service integration efforts by aligning supply side training programs with local talent demands; and

RESPONSE

The Partnership uses LMI data to produce market forecasts ensuring our services align with current and future demands. The Partnership also gathers information from industry associations and individual employers to ensure services, including training programs, are meeting local employers' needs. As discussed in response to comment 1 above, The Partnership's Business Relations and Economic Development team functions as a business intermediary in that it is



focused exclusively on meeting the needs, including training needs, of employers in our region's highest growth sectors.

COMMENT

3. The Local Plan should not eliminate business engagement functions but should expand the role of the Business Intermediary.

RESPONSE

Robust business engagement is axiomatic to workforce development generally; and in this case it is not only both prudent and federally-mandated but also aligned with the objectives of the City and County administrations which The Partnership serves.

The Partnership is obligated to periodically assess the efficacy of service delivery models used to meet the objectives of employer engagement, responding to market demand, and fashioning employer-led customized solutions based on industry need. In the WIOA Local Plan The Partnership has not proposed to eliminate all business engagement functions but rather to eliminate functions that are not yielding desired results.