

Policy Points

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Workforce Investment Act Unified Plan: Summary and Analysis

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In August of 1998, the President signed into law the Workforce Investment Act (WIA), which changes the way workforce development activities are delivered at the state and local levels, with the intention of creating a more comprehensive, customer-focused system. A subsequent state law was passed during the 1999 legislative session. Under these laws, the state is required to submit a Workforce Investment Plan by April 1, 2000. On February 8, the state Workforce Investment Board (WIB) released a draft plan for public comment. Comments are due to the WIB by March 10, 2000. This document provides an analysis of that plan.

The draft plan is divided into 13 parts: 1) vision and goals, 2) one-stop delivery system, 3) plan development and implementation, 4) needs assessment, 5) state and local governance, 6) funding, 7) activities to be funded, 8) coordination and non-duplication, 9) special populations, 10) professional development and system improvement, 11) performance accountability, 12) data collection, and 13) corrective action. The plan also includes an executive summary and appendices with more specific information on the state programs included in the plan. The plan can be viewed on the WIB's web site at <http://www.state.ar.us/workforce/uplan.html>.

The state has chosen to do a Unified Plan (the Plan) and has therefore included the following programs: 1) Secondary Vocational Education, 2) Postsecondary Vocational Education, 3) WIA activities for adults and youth and Wagner-Peyser activities, 4) Adult Education and Family Literacy programs, 5) Food Stamp employment and training programs, 6) Trade Act programs, 7) Vocational Rehabilitation, 8) Veterans Employment Programs, 9) Unemployment Insurance, 10) TANF (TEA), 11) Welfare to Work, 12) Senior Community Service Employment Program, and 13) Community Service Block Grant (CSBG).

This analysis is organized around the 13 parts of the Plan.

Key Comments on the Plan

- Many details to be included in the final Plan are not included in the draft Plan.
- The Plan needs to expand more on and be grounded in the real issues facing low-income individuals.
- It is unclear how all of the programs will be integrated into one workforce development system.
- Performance accountability has the potential to put the focus on outcomes and new ways of doing business.

Vision and Goals

Summary: The Plan presents the vision and mission of the WIB, the challenges to achieving the vision, and the goals.

Analysis: In addition to the challenges listed in the Plan, the following are also challenges to addressing the vision, mission, and goals. These should be added as challenges, and goals should be drafted to address them.

- There are few opportunities for adults with low education levels to move to the education and training activities that would prepare them for higher-paying jobs. The state needs more bridge activities to help individuals, for example, who have 6th-grade reading levels and below, to get the skills they need to qualify for community college or other higher-level training.
- Some programs continue to use the same training approaches year after year, despite the fact that these approaches have not led to increased outcomes for the participants in terms of educational achievement, job placement and retention, and earnings.
- The state's economic development and workforce investment activities need to be more closely linked. In some areas of the state, there are limited numbers of jobs for which people can be trained.

One-Stop Delivery System

Summary: The Plan describes the concept of a one-stop system and states that the WIB will develop procedures for selection and certification of one-stop operators, development and certification of one-stop systems, and memoranda of understanding between one-stop operators and partners. The Plan also includes a description of the existing one-stop delivery system, which has been implemented over the last several years.

Analysis: Since the procedures for certification of one-stop operators are still under development, several issues should be considered. One-stop operators and partners should be located near where individuals live and open at convenient hours. Transportation should be provided for individuals who want to visit the one-stops.

Plan Development and Implementation

Summary: The Plan describes the methods of joint planning for programs included in the Plan, opportunity for public comment on the programs included in the Plan, and summaries of comments received thus far. Some of the programs had public comment periods within the last few years. Public comment on this Plan is in effect through March 10, 2000.

Analysis: The public comment process proposed in the Plan is fair and open. However, some portions of the Plan were not completed when the Plan was released for public comment, making it difficult to comment on the entire plan.

Needs Assessment

Summary: The Plan covers educational and job-training needs as well as key economic trends.

Analysis: Generally, this section does a good job of describing and quantifying the education and job-training needs of Arkansans. There are a few points that could be clarified:

- In the discussion of economic trends, the Plan refers to economic growth in Arkansas, but fails to acknowledge that such growth is not occurring equally throughout the state nor for all segments of the population. For example, unemployment rates at the state level may be at historic lows, but for many counties in Arkansas and for ethnic and educational subgroups, the rates are still high. And underemployment levels are even higher.
- Also in the discussion of economic trends, there is discussion of the numbers of jobs likely to be added to the economy in the next few years. How does this compare to the number of people in the state who are not working? How do the skills levels for these jobs compare to the skill levels of the adult population?
- The Plan states that the subgroup who needs increased educational and occupational skill levels as well as an increased work ethic are low-income, educationally disadvantaged adults, including single parents, displaced homemakers, and Food Stamp recipients. It is unfair to stereotype this entire group of people as having a weak work ethic. Instead, their perceived lack of work ethic may have a lot more to do with the jobs for which they qualify and the ability to obtain the supportive services they need to work such as assessment of and accommodations for learning disabilities, child care, transportation, and health insurance.
- The Plan defines the “working poor” as those families who are working yet still have incomes at or below the poverty line. A more conventional definition of the “working poor” includes those families with incomes up to 200% of the poverty line.

State and Local Governance

Summary: The Plan describes State WIB membership and responsibilities, the local workforce investment areas, criteria for appointments to local workforce investment boards, the conflict of interest policy for local boards, and processes for awarding contracts. The Plan mentions that procedures for identifying eligible training providers, guidelines for Individual Training Accounts (ITAs), and criteria for awarding grants for youth activities, are being developed by the WIB.

Analysis: The WIB should consider the following issues as it develops policies on eligible training providers and ITAs. One, the process for certifying eligible training providers, both initially and subse-

quently, should be fair, user-friendly, and the same for all potential training providers including community colleges, apprentice programs, and community based organizations.

Subsequent eligibility should be based on performance, and again, those performance measures should be applied equitably.

Second, in designing the procedures for ITAs, the WIB should ensure that consumers have the data they need to make the most informed choice. In addition to the performance indicators required by the Federal law, they need to know what supportive services the program can provide. And they need to know what they will be able to earn at the completion of the training and if the jobs provide benefits. The ITAs should also be designed so that they cover the true costs of the training, including supportive services. Training providers who previously relied on contracts to fund their programs will need to know that the ITAs they receive will cover the expenses they have budgeted for the year. Finally, the Federal WIA law allows the use of contracts for training done in collaboration with an employer or for training provided to people with multiple barriers to employment.

Funding

Summary: The plan describes funding allocation criteria for various programs and provides some description of how funds will be spent.

Analysis: For some programs, the Plan has information about how state-level funds will be spent. However, there was no such discussion for WIA adult and youth programs. These funds should be used for demonstrations that will encourage the testing of innovative strategies that will help the state to better achieve its workforce investment goals and meet its performance indicators.

Activities to Be Funded

Summary: The plan describes the activities that will be funded under each program. However, the Plan states that the WIB is still determining the types of employment and training activities that will be carried out with the WIA adult and dislocated worker funds.

Analysis: Under the Federal law, there are three categories of activities that can be provided – core, intensive, and training services. It is important that individuals move quickly through these categories to get the training that they need to qualify for jobs that pay wages sufficient to support their families. The Federal regulations make it clear that an individual needs to engage in only one activity in each category, so that a person could have an assessment (core), case management (intensive), and be moved directly to occupational skills training (training). Assessments should be used to identify the educational and other needs of the individual, case management should be used to address the barriers that the individual has, and the person should get the training he or she needs.

Coordination and Non-Duplication

Summary: The plan says that the WIB will coordinate and integrate all services described in the plan.

Local boards will also have a big responsibility in seeing that it happens, particularly through Memoranda of Understanding (MOUs) between one-stop operators and one-stop partners, a local integration plan, and a common intake and tracking system.

Analysis: Based on the information presented in the Plan, it is difficult to envision how the coordination and integration of programs will occur. Perhaps this is a factor of the design of the guidance from the U.S. Department of Labor. It appears that specific questions have been asked about each program, and these questions have been answered by each individual agency. Therefore, the Plan presents descriptions of thirteen different programs, but there is not yet a plan for how these programs will work together.

Special Populations and Other Groups

Summary: The Plan covers strategies to target and serve special populations within each program. The Plan states that procedures for administering a priority for recipients of public assistance and other low-income individuals served with WIA Adult funds are being developed by the WIB. The Plan further states that WIA funds will be used for low-income individuals who either do not qualify or have already been initially served and placed in work through TANF, Food Stamps, or through other programs.

Analysis: The language in this section of the plan seems to imply that a TEA or Food Stamp recipient must first obtain a job before he or she will be helped through the one-stop system. The Needs Assessment section of the plan paints a very clear picture of the situation faced by this population - the average TEA recipient is testing at a 6th grade level or lower, and the majority have some learning disabilities. Given this reality, the state should support a plan that helps these individuals get the skills they need, on the front-end, to obtain decent employment that will support their families.

Professional Development and System Improvement

Summary: The Plan includes professional development and system improvement information for secondary and post-secondary education and vocational rehabilitation.

Analysis: Although it appears that the Plan guidance did not ask for this information, it would be good to know what kind of professional development is being designed for staff who are responsible for implementing the WIA adult and youth programs. For example, how are they learning about the latest developments in research and practice around workforce training programs? According to the Plan, the Department of Workforce Education appears to do a good job of keeping staff and other professionals of programs funded by DWE abreast of recent developments related to research and educational methods. That might be a good model for the WIA adult and youth programs.

Performance Accountability

Summary: The Plan describes performance indicators and goals for all programs included in the Plan.

For the WIA adult and youth programs, the Plan lists the core indicators of performance. It includes both those indicators required by law as well as additional indicators adopted by the WIB.

Analysis: Among other things, the core indicators listed in the plan will measure job retention and earnings for six months after entry into employment. To truly measure whether or not individuals are reaching a point of economic self-sufficiency, these indicators should be measured for longer periods of time, perhaps one or two years. And other things such as increased access to health insurance and the development of assets should be measured as well.

One of the additional measures adopted by the WIB will measure the ability of participants to achieve a “livable” wage. The WIB is commended for adding this measure. Program success cannot be measured solely on job placement and existence of earnings. Instead, the state must have a goal of training participants for jobs that will allow them to support their families at a minimally decent level of income. In a recent report “Making it Day to Day: A Family Income Standard for Arkansas,” Arkansas Advocates for Children and Families quantified an Income Standard for various family sizes. The WIB should use this Standard as a performance indicator.

Finally, the negotiated performance standards need to take into account the barriers of the people who are being served. If not, local WIBs and training providers will be more likely to serve only those people who are most likely to succeed. There should be a tiered set of performance measures that takes into account those training providers who work with people or in geographic areas with significant barriers, such as severe personal and financial issues.

Data Collection

Summary: The Plan includes data collection information on the various programs included in the plan. For WIA adult and youth programs, the Plan states that a data collection strategy is being developed by the WIB that will include a process for collecting and validating performance data and a description of the common data elements and reporting systems.

Analysis: Since the data collection strategy is still under development, the WIB should consider several issues. One has to do with the cost of data collection. The Federal WIA law states that affordable data collection measures should be developed or the state should provide the resources needed to collect the data. It is likely that Unemployment Insurance wage data will be used to track earnings. The state will need to provide this data directly to training providers or find ways for them to access it. Another has to do with the technical expertise needed to understand the data. The state may need to provide technical assistance to help providers interpret the data that is required to measure the performance indicators.

Corrective Action

Summary: The Plan states that a system of corrective action plan is being developed that will include a formal corrective action plan, technical assistance, and a final step of withholding funding.

CONCLUSION

The Workforce Investment Board's Unified State Plan sets forth a vision and a mission that, if realized, would make Arkansas a place where workers train for and access meaningful employment that pays enough to support their families. Arkansas would also compete well for business and industry because of its high-skilled and hard-working labor force. However, that vision and mission are not likely to be realized unless the various programs and organizations involved are willing to change the way that business has always been done. For example, traditional approaches to education and training must be supplemented with the appropriate supportive services, assessment and accommodation for learning disabilities, and barrier reduction.

Many of the details for carrying out the vision and mission are not yet decided, which makes it difficult to assess whether or not this will be a new system or the same old system with a new sign on the door. The Plan also lacks a clear description of how the various programs will be woven into one workforce development system. And finally, the Plan is not well grounded in the realities of the Arkansas economy as it affects individuals with low education levels and areas of the state with high unemployment rates.

However, the focus on performance accountability sets the stage for making the changes that are necessary. All programs and organizations must be held accountable for achieving outcomes. Rather than being rewarded for the number of people enrolled or served, programs must be held accountable for economic outcomes such as employment and livable wages. If they cannot achieve the outcomes, then new strategies must be tried.

The public comment period for the Plan closes on March 10, 2000. WIB staff will take the comments and prepare the plan for its final review by the WIB Executive Committee on March 21. The Plan must be submitted to the Federal Department of Labor by April 1, 2000. The Plan will go into effect on July 1, 2000. Following submission of the plan, the WIB will begin work on *A Blueprint for the Future of Workforce Development in Arkansas*. It is hoped that this document will include more of the specifics on how the workforce development system in Arkansas will move forward to achieve the vision and mission laid out in the Unified Plan.

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