

SYSTEM INTEGRATION

ABOUT THIS SERIES

The stated purpose of the federal Workforce Innovation and Opportunity Act (WIOA) is “to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth.” Through this series of briefs on key equity levers in WIOA, World Education, Inc. (WEI) provides analysis of WIOA quantitative data 2016-2019 and recommendations for WIOA reauthorization on five key topics:

- CO-ENROLLMENT
- CO-INVESTMENT
- CAREER PATHWAYS
- PERFORMANCE ACCOUNTABILITY
- SYSTEM INTEGRATION

The goal of the series is to inform policy makers and other key stakeholders on WIOA outcomes to date and present options for increasing the efficacy of the WIOA legislation to promote equity.

WIOA STRATEGIC PARTNERS

To act as an equity investment, WIOA requires state and local partners to strategically plan and implement complementary services in order to comprehensively support individuals confronting barriers to educational and economic mobility.¹

Under WIOA, states choose to develop a four-year **Unified** or **Combined** State Plan describing the state’s strategies to use the workforce development system to improve individual prosperity and regional economic competitiveness.

The minimal requirement is a Unified State Plan that demonstrates alignment among the six WIOA core partner programs: Title I Adult, Dislocated Worker, and Youth; Title II Adult Education; Title III Wagner–Peyser Employment Service; and Title IV Vocational Rehabilitation Services. The U.S. Department of Education oversees Titles II and IV while the U.S. Department of Labor governs Titles I and III. In the states, as many as four agencies oversee WIOA core partners and many more are involved as *required* partners.

In introducing the Combined State Plan option, WIOA promotes expanded partnerships through encouraging broad joint planning with other education, public benefit, and workforce development programs. However, there is limited uptake by states to use this federal flexibility. While 62 percent of states did submit Combined 2020 plans, the partners identified as jointly planning with the required WIOA core partners are mainly small-scale federal workforce development programs run within the same agency as WIOA Title I, e.g., trade adjustment assistance, veterans’ state grants, senior community service program.

The partner listed in the WIOA State Plan template with the greatest potential to impact career pathway educational services is the Strengthening Career and Technical Education for the 21st Century (Perkins V) system. Eleven states submitted WIOA/Perkins combined plans: Alabama; Delaware; District of Columbia; Indiana; Minnesota; New York; Ohio; Pennsylvania; Rhode Island; Vermont; and Virginia. A limited number of states took the opportunity to strategize with public benefit program partners such as TANF, SNAP E&T, in support of shared participants.

The text of WIOA promotes integration, but implementation has kept programs pigeon-holed and participants largely responsible for cobbling together needed services. A bolder approach is needed.

WIOA REAUTHORIZATION RECOMMENDATIONS

Amend WIOA to embed provisions in Section A of Title I - System Alignment focused on service integration, specifically on utilizing co-enrollment, shared performance accountability, and braided funding to comprehensively and efficiently serve WIOA participants. Change the title of Section A to System Alignment and Integration.

This Title should accomplish these goals:

- State overall federal policy on skill development integration comprehensively among all named core and required partners.
- Define target populations across programs and authorize the U.S. Departments of Education and Labor to provide guidance regarding participant co-enrollment, including guidelines to determine what to do with participants without work authorization.
- Create common definitions across programs, including 'career' and 'training,' so that these are defined as the same activity across each of the titles with a level of precision and clarity that would provide adequate direction to the field in absence of regulations. Define these key terms in the Definitions section of the law.
- Amend the authorizing statutes for antipoverty and economic mobility partners, including TANF ES (Temporary Assistance to Needy Families Employment Services); SNAP E&T (Supplemental Nutrition Assistance Program Employment and Training); HUD E&T (Housing and Urban Development Employment and Training); Opportunity Zones; TAA (Trade Adjustment Assistance). These amendments should address the requirement for coordination, specify partnership roles and responsibilities, and address braided resources and reporting. Alternatively, include authority for tribal, municipal, county and state governments to request — in exchange for improved outcomes — flexibility including waivers to pool all federal discretionary resources where workforce development activities are permissible.
- Establish shared performance metrics across all federal education and training investments. These metrics would be used to highlight how workers and businesses are being served by those programs, to identify racial and other equity gaps where they exist, and require corrective actions where programs are not meeting performance goals.
- Include Perkins V, TANF and HEA in a coordinated accountability system with the WIOA core titles. In addition to the use of the common WIOA metrics, this would provide for inclusion of these programs in the negotiation of state-level goals and authorize the U.S. Departments of Education and Labor to develop coordinated approaches to reporting.
- Authorize Higher Education Act Financial Services Administration adult dual enrollment to support accelerated models of secondary-postsecondary credential attainment for adult learners.

- OCTAE should implement demonstration pilots for AEFLA providers modeled after the Every Student Succeeds Act (ESSA) Innovative Assessment and Accountability (IADA) Demonstration Pilots. IADA allows participating states to pilot innovative new systems of assessments in a subset of school districts before scaling statewide. States may apply on their own or as part of a consortium of up to four states. Such demonstrations could be used to encourage experimentation in developing assessment models related to:
 - Competency-based education; or
 - Placement practices that do not engage standardized testing, including self-placement.
- Implement an integrated performance accountability system among the WIOA core titles. This integrated performance system would include:
 - Participant-level data collection by US ED and USDOL to support the effective measurement of results for each of the core measures, including access to appropriate administrative records within a framework that protects participant privacy;
 - A common approach to state and local goal setting across the programs, including an expanded statistical adjustment model process that incorporates data from all core program titles;
 - Reinstatement of incentive funding for exemplary performance for each of the core programs, including incentives for reduction in equity gaps;
 - Departmental authorization to issue guidance, waivers, and technical assistance, as needed, to facilitate the implementation of an integrated performance management model, including permitting shared reporting of jointly managed services, such as career pathways programs, and technical assistance on performance reporting for integrated service delivery to common participants; and
 - Improvement of the measurement of the effectiveness of the system in serving employers, so that this measure is appropriately applied across all core partners, as well as other partners in the American Job Center. Additionally, refocus the metric on shared investment in employee reskilling by employers with the public workforce system and on hiring WIOA participants into quality, living wage jobs.

Confronting Barriers

Barriers To Success

WIOA seeks to direct services to those most in need in local communities through disaggregated reporting to a category of people deemed “individuals with barriers to employment.” This prioritizing of public resources is a laudable goal and the list of barriers is comprehensive and derived from data demonstrating the relationship between a barrier and unemployment rates. However, the characterization of the individual as containing the barrier is counterproductive in designing the very workforce development interventions needed to address those barriers, only some of which are temporary and situational, like homelessness. Further, this deficit-based framing disrespects those we serve and further taints the WIOA system and WIOA system participants as being individuals in need of fixing, with the “fix” frequently being placement in a low-quality job and an ‘exit’ from services.

Recognize Assets

WIOA reauthorization needs to address this deficit-based language while maintaining critical reporting on who receives what services and to what impact. One way to do this would be to reframe ‘individuals with barriers’ to ‘individuals CONFRONTING barriers’ and to clearly articulate the public workforce system’s role to support that confrontation with resources needed to overcome barriers. Reauthorization should also involve a stakeholder consultative process, much like that included in Strengthening Career & Technical Education for the 21st Century Act (Perkins V) in which people confronting the barriers detailed in WIOA priority populations should be involved in designing the services for their communities. Adults in our communities have skills and experiences that can be a powerful starting point for building toward their career aspirations. WIOA needs to leverage job seekers’ assets in order to design more effective solutions.

¹ Note recommendation to change WIOA’s Individuals with Barriers to Individuals Confronting Barriers (see text box above).

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