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WORKFORCE INVESTMENT ACT (WIA) COMMENT PERIOD UNTIL JUNE 30

The United States Department of Labor is soliciting comments on implementation of the Workforce Investment Act. DOL is particularly interested in the effectiveness of One-Stop centers and the integration of WIA and TANF programs.

WIA must be reauthorized in 2003. In preparation for reauthorization, the United States Department of Labor (DOL) is soliciting comments from the public. Attached below are the CPPP's comments, made on April 30, 2002 at a DOL forum in Dallas. Information on how the public can make comments through June 30, 2002 is included at the end of this Policy Page.

CPPP COMMENTS ON WIA REAUTHORIZATION

The Center has been closely involved with both the TANF and WIA programs and with their predecessors – AFDC and JTPA. In 1995, Texas preceded WIA by integrating its workforce programs and creating local workforce development boards. In participating in the policy debate at the time we were encouraged by new opportunities to integrate employment services for the lowest-income Texans and to foster new local responsibility for helping those families move toward economic security.

Unfortunately, the Texas workforce system has only partially fulfilled this promise and both state and federal policies continue to create roadblocks to both real integration and positive economic outcomes for families. The good news is that our local workforce development boards do take their responsibilities seriously and see themselves as integral to economic prosperity in their communities. The bad news is that they operate in a frustrating confluence of conflicting rules and policies that drive them toward process not outcomes, and, from our perspective, leave those most in need of employment assistance not much further along the road to economic success

The current debate over TANF reauthorization, the impending reauthorization of WIA and the intersection of the two provides a unique opportunity to reshape both programs so that a slogan of our workforce system – “get a job, get a better job, get a career” – is more than rhetoric.

CPPP comments focus on three themes: the role played by conflicting performance expectations in WIA and TANF, the disconnect between the rhetoric of job retention and wage advancement and the reality of families' experiences in Texas, and finally the work currently being done to connect poor low-income dads with the workforce development system.

OUTCOMES NOT PROCESS

As noted in a recent United States Government Accounting Office report, a primary challenge to coordinating TANF and WIA services is the need for “more compatible program definitions and requirements.” In Texas, TANF employment services are integrated with the rest of the local workforce system and the network of One-Stop centers in communities around the state. However, there is a major disconnect between how the TANF program is measured and how other employment services, including WIA, are measured. This disconnect not only hampers the integration of TANF and WIA services, but also further segregates the hardest to serve clients within the workforce system.

TANF work participation rates and hourly requirements measure little more than process. If

TANF and WIA are to be successfully and meaningfully integrated, performance measures of both programs must be more closely aligned, and we would argue that it is the TANF measures that need to change. If these two systems are to succeed in helping those in need of work and in helping employers find skilled workers they must look beyond process measures to real outcomes. This is especially true for the TANF program, whose clients are often those with the least education, training and marketable skills, who have often cycled in and out of dead end jobs for years. TANF program measures should be focused on “entered employment, job retention, entered wages, and on wage advancement.” To better understand the impact of the disconnect between TANF and WIA performance expectations, let’s look at the issue through the eyes of some of the system’s relevant players:

Employers: Business representatives on local workforce boards become extremely frustrated by TANF’s process-focused measures. Many of them feel that “those welfare programs” are the tail wagging the workforce system dog. Board members perceive the measures as being directly at odds with the business-like outcome focus they are trying to implement in workforce programs. This frustration has made it difficult to retain good board members and also continues to drive a perceptual wedge between the poorest consumers of employment services and all others utilizing the system.

Caseworkers: As the Texas system strives to provide more universal service and desegregate its staff functions, conflicting program measures are a major stumbling block. Caseworkers assisting TANF clients must track the individual’s every move. If the client does not meet every single requirement, the resulting performance measure may reflect directly on a caseworker’s own performance evaluation. This is antithetical to the kind of relationship you would want to foster between caseworker and client, one in which the focus is on understanding the client’s situations and choosing the best employment plan and working together with them to make them successful. Instead, caseworkers are forced to be policemen and women so that the local board and the state do not “fail.”

Clients: Clients understand the new focus on work and the expectation that they must participate

in employment activities as a condition of receiving assistance. What they do not understand is the disconnect of the process they are forced to undertake and their own labor market experience. We’ve heard story after story of clients coming to the workforce system with clear desires to improve their education and skills so they can get a better job. Instead they are redirected back to the same entry-level, low-skill jobs they have endured already. They want to work, and even are willing to take that first available job, as long as the system offered some rational options for advancement, for new skills, for a ladder to that “good job.” Instead they face a system that should rightly be called “work only” not “work first.”

EMPLOYMENT, RETENTION, ADVANCEMENT

At a meeting in mid-April with the Department of Health and Human Services’ Administration for Children and Families’ Assistant Secretary Wade Horn noted that neither “work first” nor “training first” will move families out of poverty. Instead, he argued, a combination of the two approaches is most effective. There is universal acceptance that Americans need to work whenever possible to support themselves and their families. There is also widespread recognition of the importance of job retention and wage advancement supports to make real economic security possible. However, for too many Texans in our workforce program that job ladder has only the first couple of rungs.

Job retention and wage advancement do not happen on their own. Job placement that is not directly informed by an employment plan that explicitly includes a “retention plan” and an “advancement plan,” is indeed “work only.” Workforce services clients must be provided with the tools they need to get a job, keep that job, and advance to something better. This takes much more than rhetoric to accomplish. Both WIA and TANF must do a better job of developing real individualized employment plans for clients so they can chart a long-term course toward self-sufficiency. Making this real will require new expectations of these systems, new types of well-aligned performance measures and direct connections between the job placement, job training and job development components of these systems. This will also entail creative relationships with employers either willing to offer on-the-job training or work schedules flexible enough to allow

workers to attend education and training activities. If we do not take this task seriously our workforce systems will continue to spout nice slogans while low-income workers are placed in jobs that make it virtually impossible for them improve their skills, their wages and their opportunities.

YOUNG, LOW-INCOME NON-CUSTODIAL DADS: A CASE STUDY

The experience of many young low-income fathers is exemplary of how hard-to-serve clients interact with the One-Stop system. Young dads have different needs, ranging from parenting classes to substance abuse to child support. Employment assistance remains one of their top priorities. On paper, the WIA has made a strong commitment to helping young fathers qualify for services—through the identification of barriers, separate income verification, and with targeted services for ‘out-of-school’ youth. These elements should be lauded and integrated into other workforce programs seeking to better serve fathers. Still, in practice, non-custodial fathers are not screened as parents. Therefore, WIA data systems cannot adequately track young fathers or determine local need for additional services to young parents. More accurate tracking and outreach to young low-income fathers should be a priority in the continuing integration of TANF and WIA.

Many One-Stop contractors have no experience with hard-to-serve clients. A telling example is the effort to help “out-of-school” youth. Many Boards are having trouble with outreach to this population. In one local Board area, a Texas Fragile Families site was asked to apply for funds after no contractors submitted a proposal for an out-of-school youth contract. More encouragement from the DOL on forming valuable community-based collaborations for supportive services would likely help local Boards better connect to these “hard-to-find” groups.

The “sequence of services” under WIA has resulted in a system filled with hoops that customers must jump through to get what they need. As one WIA career specialist put it, case managers need to be fighting more for what programs low-income parents *could qualify* for instead of trying to *disqualify* them from more intensive services like skills trainings and education. Rigid application of the “sequence of services” reduces the system to a “one size fits all” approach and confuses hard-to-serve clients to the

point of frustration and exit. “I could get this type of job on my own” or “I’m already working for minimum wage” are frequent responses from under-employed caught in the system.

More opportunities to “earn and learn” must be encouraged. No other opportunity most clearly takes the benefits of “work first” and training and joins them together than on-the-job training and customized trainings. OJT and customized trainings should be a priority for the DOL as a way to engage employers to train people according to employers’ needs and to raise wages and skill levels for people according to the individual’s abilities. OJT avoids the complicated training provider model, and gets employers the trained people they need while connecting people to work that pays. Boards and employers haven’t caught up with new OJT guidelines. Texas Fragile Families has even used Section 1115 Child Support monies on a cost-sharing basis as an incentive to get Boards to try OJT. DOL needs to better promote these programs to employers and offer incentives to Boards to use them.

PUBLIC COMMENT THROUGH JUNE 30

Information on WIA reauthorization and an on-line comment form can be found at made at <http://www.usworkforce.org/reauthorization/comments.asp>.

WIA reauthorization comments can also be e-mailed to reauthorization@doleta.gov.

Comments can be faxed to (202) 693-3015 or sent directly to:

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