



Sample Letter – Comments on WIOA State Plans

The Workforce Innovation and Opportunity Act (WIOA) offers states and local agencies a host of opportunities to think about job training and educational tools in a new way, including by building meaningful partnerships with local service providers, the business community, institutions of postsecondary education, and other government agencies that support low-income families. Currently, all 50 states are developing WIOA State Plans, **due March 2, 2016**, that outline specifics for the state's workforce development program design, evaluation measures, and coordination with other government agencies and non-government partners. The State Plans may be focused exclusively on workforce development programming ("unified" plans) or – as the President has strongly encouraged – include strategies for coordinating and integrating WIOA programs with services provided by other state and local agencies, such as TANF, SNAP, social services, or housing assistance ("combined" plans).

A recommended strategy to advocate for the inclusion of 2Gen strategies in your state's WIOA State Plan is to engage the state workforce board and/or task force by communicating clear comments and recommendations. We encourage you to use this sample as a template to assist your thinking about comments or recommendations to send to the decision-makers in your state.

To Whom It May Concern:

The following are comments on MD's Workforce Plan released by the Governor's Workforce Investment Board on January 15, 2016.

These comments are being provided after consultation with a significant group of stakeholders in Allegany and Garrett Counties who are providing comprehensive services to families with young children using a 2 Generation Approach. These stakeholders include: Garrett County Community Action, Garrett County Health Department, Garrett County Department of Social Services, Garrett College, Western Maryland Consortium, Allegany County Human Resources Development Commission, Inc. (HRDC), Allegany County Department of Social Services, Allegany County Bridges to Opportunity Steering Committee and Local Management Board of Allegany County.

Introduction

We applaud Governor Hogan's vision for an integrated, effective, efficient workforce development system which places job seekers and business at its center. We are particularly pleased to see the choice to offer a Combined Plan and the inclusion of TANF, Jobs for Veterans and Reintegration programs.

We encourage the Governor to consider a 2 Generation framework (serving parents and children together for the benefit of the family) in the state's approach to its workforce development system with a focus on the particular needs of parents struggling with un-employment and under-employment.

Forty percent of Maryland's labor force are parents and 13% have children under the age of 6 in their homes (2014 calculations based on Child Protective Services). Overall, parents in Maryland face a 5%



unemployment rate (according to Kids Count). We know that parents, especially those with young children, are likely to have a need **for high quality child care and education for their children**; meeting this need for child education and care must be a factor in helping parents seeking work. Further, in Garrett and Allegany counties as well as other rural MD counties, there is likely to be a **significant transportation barrier** for these families; a barrier that is realistically unlikely to be met entirely by public transportation in rural areas. Finally, there is a significant need **for career pathway planning and coaching, education and training, and an economic development focus** that increases the number of living wage jobs and the career pathways to reach them, particularly in the rural areas of the state.

The unemployment rate in Garrett County is 6% and in Allegany is 6.4%. As these relatively low (although still higher than the state as a whole) numbers show, most families are working. Unfortunately, they are working in low wage jobs (often more than one low wage job). Garrett County (along with Worcester County) have the lowest average wage rates (\$621/week) in the state with Allegany County and the rest of the eastern shore not far behind (\$622-\$755/weekly).

In addition to the low wages and part time work, there simply aren't enough 'living wage' jobs in the states rural areas. In Garrett County, according to the Local Area Unemployment Statistics Program, in November there were 2.32 unemployed workers in the county for every opening (3rd highest in the state). Allegany was slightly better at 9th in state and 1.5 unemployed persons per opening. We'd recommend an acknowledgement in the WIOA plan that rural areas in the state have a particular need for a dual focus on economic development and career pathways with coaching and support that helps families see their way to a brighter future.

Specific Comments/ Recommendations

1. We recommend adding **parents with childcare and transportation barriers** to target populations defined by the state as having barriers to employment. This will highlight these particular barriers which are so critical in some of the most economically challenged areas of the state and will lead to a robust discussion on how to serve this population within the WIOA implementation.
2. The plan should encourage **local workforce development boards to engage child care providers and Head Start as partners** and in some cases include them as members on the local workforce boards. Again the goal is to be able to meet the needs of parents who are seeking employment.
3. Because child care is a critical need for many families seeking work, we'd recommend a concerted focus on the **Child Care Development Block Grant as an important component of meeting the child care needs of unemployed parents**. Specific thoughts include:
 - a. Consider including staff from these programs in the "Alignment Committee" mentioned on page 55 of the draft plan.
 - b. Seek ways to simplify child care subsidy, eliminate the requirement that parents formally seek child support in order to qualify and consider co-enrolling/automatic



enrollment in child care subsidy when parents qualify for other support programs such as SNAP.

4. The stand-alone job center in Garrett County was closed. In Garrett County, some job seekers still do not have access to computers in the home, internet access and/or the technical skills to navigate the MWE website. **We encourage the inclusion of resources for staff and technology upgrades to help Western Maryland Consortium meet the needs of job seekers that had been served by the Job Center.**
5. A significant focus of the WIOA legislation is around youth including a requirement that 75% of WIOA youth money must go to out-of-school youth. In Garrett County, many TANF clients are under 24 and need assistance with GED or external degree programs and/or career pathway planning. We recommend **a particular focus on seamless participation of these youth in the WIOA system with extra support services that include Substance Abuse treatment.** The inclusion of Substance Abuse in the additional services eligible for integration in the holistic workforce development would be important to serving these young adults.
6. The WIOA Plan begins with comments that Job Seekers are customers and should (along with businesses) be at the center of the system. “In placing the customers (businesses and jobseekers) that rely on the workforce system at the center of the decisions that are made regarding the system, Maryland’s WIOA Partners must continue to strive for excellence, innovation, and the best service delivery possible.” However the direct voices of the un-employed and under-employed are not incorporated into any of the governance or advisory and feedback structures of the system. **We’d recommend the plan find ways to directly include people who are or have recently been un-employed or under-employed in the structures that govern and provide feedback to the system, potentially the WIOA convening mentioned on page 55 would be a start.**
7. The Youth Focus portion of the plan (in Section 4 and starting on page 105) includes references to co-enrollment in programs. **We’d recommend the adult workers, adult education, and TANF portions of the plan also directly encourage co-enrollment in SNAP, Medical Assistance / ACA Navigator, energy assistance, head start/early head start and pre-k, child care subsidy, and State Sponsored IDAs(as revised below).** Specifically the plan could mention following strategies that can assist with co-enrollment:
 - a. Co-location of program staff (i.e. job services in head start centers; staff able to enroll or recertify) SNAP, Medical Assistance, child care subsidy and energy assistance jointly located with WIOA staff.
 - b. Joint eligibility criteria and intake processes. Broaden the consideration of cross enrollment or joint eligibility to include SNAP, child care subsidy, energy assistance, medical assistance, and WIOA funded training or other supportive services.
 - c. Considering office hours and other practices for re-certification that understand employment and training needs of families.



- d. Automatic enrollments (Opt Out) or eligibility across multiple supportive programs again including energy assistance, SNAP, child care subsidy, medical assistance, and job services.
8. We applaud the partnership with the education system particularly community colleges. **We'd encourage the plan to specifically and directly address engagement with school systems, head start, early head start and pre-k programs as an important component of meeting families broader needs;** this might include the funding or provision of computer resource rooms and training volunteers for those rooms in head start or child care centers.
9. **Use of TANF MOE and other funds to expand the state IDA funds and explicitly allow their use used for vehicle repair and purchase in rural areas of the state.** In rural areas like Garrett and Allegany Counties, the ability to successful keep a job is directly related to having an operating vehicle. Public transportation cannot efficiently provide off hours or "just in time" transport that many entry level jobs demand.
10. While career pathways are mentioned in the plan, **we'd like to ensure that MD's allowable model for career pathways includes specific references to career coaching services which we have found to be particularly important for families with young children who are facing multiple barriers to employment.** Further, we encourage the Governor to focus on the "additional services" portions of Career Pathway model, which as is mentioned in the plan can include "...transportation, suitable attire for business, tools, work or training equipment, child or dependent care, graduation fees, union fees, clothing for interviews or work, and more. "
11. There is significant focus in the plan on creating an integrated workforce data system. We applaud these efforts.
 - a. A critical additional consideration is the ability for partners in the WIOA system to be able to provide data electronically to and pull data from the client based portion of the system. State programs are often implemented in whole or in part by private nonprofits. Those institutions are also responsible for the collection of a wide array of data about the people they serve and have their own data systems for managing their operations. This partner data collection should be considered in the comprehensive approach to streamlining data collection for clients. **We strongly recommend that the state should establish policy stating it encourages the exchange of data with its partners whenever possible and follow up with development (in conjunction with federal partners) specific data standards that will allow the exchange of data without sacrificing data quality or security.**
 - b. **We recommend that the plans upgrade and interoperability of the systems include the outdated "CARES" database used by DSS programs and integration with the OHEP system.** We strongly believe that up-to-date and interoperable data systems can better



and more efficiently support families as they seek economic security. Unfortunately, without the upgrade of the CARES system an entire group of important support services would be left out of any integration.

12. Coordinated assessments and career plans are specifically mentioned in the youth section of the report. **We recommend that common and integrated assessments and plans should also be highlighted in the adult education and adult workers sections.** The plan should explicitly allow and encourage the cross development of plans by multiple partners into a single plan that can meet many requirements so that the family has a single plan. We also would encourage assessments to ask questions about children in the home and to explicitly deal with childcare and transportation.
13. Digital literacy is mentioned in several places in the document and this is an important competency for job seekers in 21st Century. **We recommend that financial management education and competencies** are also explicitly mentioned and woven into adult education and youth focus sections of the plan.
14. Currently Western MD is a region and includes Washington, Allegany and Garrett Counties. Allegany and Garrett County share significant economic regional factors which are not shared with Washington County. We'd suggest in the reconsideration of WIOA planning regions that there be consideration of moving Washington County to be joined with Anne Arundel County and have Allegany and Garrett County as a Western MD planning region.